

ESTTA Tracking number: **ESTTA743941**

Filing date: **05/03/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216330
Party	Plaintiff Leonard Webb
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Date	05/03/2016
Attachments	2016-05-02 Webb TTAB complaint.pdf(2471412 bytes )



Certificate of Service

I hereby certify that, on May 3, 2016, a true and correct copy of the foregoing letter and the attached Complaint has been served upon the Applicant's attorney via email.

/s/ Joe Gribbin

Joe Gribbin

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LEONARD WEBB,

Plaintiff,

v.

REGINALD CLINTON BROWN  
and BLACK TRIBBLES, LLC, a  
Pennsylvania limited liability  
Company,

Defendants.

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Case No.

**COMPLAINT  
JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Leonard Webb (“Webb”), by and through his attorney, for his complaint against Defendants Reginald Clinton Brown (“Brown”) and Black Tribbles, LLC, alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for trademark infringement, unfair competition, and false designation of origin in violation of the Lanham Act, 15 U.S.C. § 1125(a), and common-law trademark infringement and unfair competition in violation of Pennsylvania law, 54 Pa. Cons. Stat. Ann. § 1126.

**PARTIES**

2. Plaintiff Webb is an adult individual who is a resident and citizen of the Commonwealth of Pennsylvania.

3. Defendant Brown is an adult individual who is a resident and citizen of the Commonwealth of Pennsylvania.

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