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8 Attorney for Defendants
9 HEAL THE WORLD FOUNDATION
10 and UNITED FLEET

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JOHN G. BRANCA, Special)
14 Administrator of the Estate of)
15 Michael Jackson; JOHN MCCLAIN,)
16 Special Administrator of the Estate of)
17 Michael Jackson; TRIUMPH INTERNA)
18 TIONAL, INC. a California corporation,)

19 Plaintiffs,

Case No.: CV 09-07084 DMG (PLAx)

**DEFENDANTS' WITNESS MELISSA JOHN-
SON'S DECLARATION IN LIEU OF
DIRECT TESTIMONY**

18 HEAL THE WORLD FOUNDATION, a)
19 California corporation; UNITED FLEET,)
20 a California corporation; and DOES 1-)
21 10, inclusive,)

22 Defendants.)

Time: 9:30 AM
Date: April 19, 2011
Place: Courtroom 7
Judge: Hon. Dolly M. Gee

23 **TO THIS HONORABLE COURT AND ALL INTERESTED PARTIES:**

24 Defendants Heal the World Foundation and United Fleet hereby submit
25 their witness MELISSA JOHNSON'S Executed Declaration In Lieu Of Direct
26 Testimony.
27

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2
3 I, MELISSA JOHNSON, under penalty of perjury, hereby declare that I will ap-
4 pear at trial and testify the following information to be true, accurate and correct:
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6

7 1. I, MELISSA JOHNSON started working on developing the content of
8 the current initiatives in 1993, viewing them at the time as a supplement to the
9 charity that became visible to the public the year before, and particularly in
10 1993 when its profile was raised after the 1993 Superbowl.

11 2. An “initiative” is a discrete plan of fundraising or statement of objec-
12 tives such a board game that teaches children communication skills and offers
13 moral guidance, an after school program that brings interracial children to-
14 gether to participate in supervised athletics in order to learn to get along to-
15 gether, a video game that teaches after-school social skills, a group called Mi-
16 chael’s Army which gathers people of different economic background and edu-
17 cation levels to demonstrate their commonality. I developed over a dozen initia-
18 tives which included Michael Jackson telethon to raise money for disease re-
19 search.

20 3. In January 2001, I shared my ideas to revive Michael Jackson’s
21 floundering Heal the World Foundation with Melvin Wilson who was receptive
22 to my explanations of its various initiatives. We decided to put on paper, and
23 online, the various initiatives I had conceived of for the charity in 1993.

24 4. Sometime after March 20, 2001, in New York, I met briefly with
25 Rabbi Boteach (co-chair with Jackson of Heal the Kids, an initiative of Heal the
26 World Foundation). At that time, Michael Jackson had given the Rabbi au-
27 thority to run his charity, Heal the World Foundation. I came to discover that
28

1
2 Rabbi Boteach did not have the best interests of the Charity in mind and I be-
3 gan, on my own, to step up to show Boteach and others how the Charity
4 should be run to make it successful and to share my ideas.

5 5. I continued on my own to develop initiatives, plans, and economic
6 plans, and I eventually met with Michael Jackson himself to share my ideas. I
7 did not ask for pay but continued to work on my ideas for the Charity with the
8 idea of one day showing Michael Jackson what I could do if I were in charge of
9 his Charity. I could see that the Charity at time was in deep trouble and falling
10 dormant.

11 6. In 2001, I had contacted Michael's manager, Evvy Tavasci, by
12 phone, who subsequently gave me her address details so that I could send my
13 ideas for the Charity along to Mr. Jackson, via MJJ Productions, Inc. In that
14 conversation, she agreed to keep confidential the information I would send her.

15 7. I explained to her that my information was proprietary and private
16 and that some of it was very personal and private. I gave her a copy of a book
17 of about 900 pages of ideas. I did not hear back from Ms. Tavasci. I attempted
18 to contact her to see if the book (bound and hefty printout with all the details
19 of HTWF's initiatives) was sent along to Jackson, and whether he had any in-
20 terest in the material. If not, I asked her to send the material back to me (I
21 said I would pay for the shipping). However, no communication came back,
22 and I sent a few more letters asking for the return of the material or at least
23 word that is was safe and its whereabouts.

24 8. After a long period with no reply, I became concerned about my pro-
25 prietary writings that were now at large, including my private personal infor-
26 mation. I soon realized that Jackson simply had gatekeepers who went to great
27 lengths to protect his privacy, and were not permitting material to get to him,
28

1
2 even material that I believed, on a humanitarian level, would save lives some-
3 day.

4 9. After a few blunders on my part trying to get my information to Mr.
5 Jackson in the Spring of 2002, I finally began working with various Jackson
6 reps, and these relationships were at times long lasting (see Exhibit A), as well
7 as warm and trusting (see Exhibit B). The communications at this time were
8 between myself and Michael's camp. Sometimes his representatives called me
9 and sometimes I contacted them. These relationships continued for years.

10 10. Michael Jackson had an attorney named Evan Spiegel. I explained
11 to Evan Spiegel that no one was protecting the Jackson trademarks and do-
12 main names. I urged Spiegel that he should police these marks. Over time, my
13 relationship with Spiegel became strained.

14 11. At around the same time, I also started conversing with another
15 Jackson rep, Greg Chamberlain, someone that managed many of Jackson's
16 domains. I wanted to make sure Jackson did not get ripped off by the high
17 prices his attorneys charged for domain work, and even explained in an email
18 to Spiegel that it would be best to save Jackson money if I transferred names
19 via his domain management firm instead (see Ex.C).

20 12. In the summer of 2003, I started to transfer many hundreds of
21 names to Jackson/MJJ Productions related specifically to the initiatives in the
22 revived charity book that I handed to Jackson at the end of 2002 (see Ex. G), a
23 slimmer version of which Stuart Backerman (see Ex. H) confirmed that Evvy
24 Tavasci had subsequently passed to Jackson in 2003 (see Ex. I). Michael's Ar-
25 my was copyrighted in 2002 (see Ex. GGG), and Michael refers to his Army
26 within two months after Ms. Tavasci gave Michael Jackson my book at a 45th
27 birthday event held in his honor. I quote Mr. Jackson on that occasion:
28

1
2 “It was YOU on a worldwide basis, who supported me as my army, my soldiers of
3 love” “People used to ask me, like, you always talk about ‘Heal the World’, why
4 do you need all these soldiers on the stage?’ I said, ‘They’re soldiers of love.’ ”
5 (see Ex. EEE).

6 13. I invented “Michael’s Army” and “Michael’s Army of Love.” I was
7 pleasantly surprised to see that Michael Jackson had begun to receive copies of
8 my work and was incorporating my creations into his language. Finally I had
9 broken through the wall erected by Michael’s gatekeepers and was encouraged
10 by Michael’s incorporation of my ideas Heal The World Foundation.

11 14. A copy of the 2002 manual I passed to MJJ Productions back in
12 2002 and 2003 has been produced in this action and is Bates numbered in the
13 Exhibits. Jackson’s camp received it years earlier. The date stamps at the
14 bottom of each page indicate that this is the 2002 copy I *printed* out and gave
15 Mr. Jackson in December 2002. The front cover had been replaced by someone
16 in Jackson’s camp and simply reads “Heal the World Foundation (MJJ Produc-
17 tions, LLC.)” on it. (see Ex. OOO of my Feb 7, deposition, book 2 of 2).

18 15. Many of the ideas that were included in my work and specifically
19 listed to my booklets which I delivered to Michael’s handlers became to show
20 up in a variety of places and many of my initiatives began to come into focus. I
21 was the first one to suggest Cirque du Soleil. Those performances are sched-
22 uled to begin in Montreal Canada soon and proceed to about 29 other cities.

23 16. The 2002 manual which I personally gave to Mr. Jackson and sent
24 other updated versions of it, over the years to Jackson via various reps, per-
25 haps over a dozen in all (see Ex. S). And in those books, including the 2002
26 MJJ Production one mentioned above, I reference Cirque again and again. I
27 say in the HTWF book:
28

1
2 17. *“The performances will include cirque de sole [sic], animal acts, the-*
3 *atrical skits, games, and documentary from young and old, from Japan to Paris,*
4 *Africa and the shores of central America to the Canadian boarder”* (see Ex.JJJ).

5 18. I did my best to capture domain names and registered trademarks,
6 solely at my own expense, for the benefit of Michael’s Charity. In 2004, I was
7 approached regarding these intellectual properties and I signed over, by contact
8 with Michael Jackson, all of the intellectual properties I had protected. I did
9 this at my expense and was not compensated in any manner whatsoever. I had
10 borrowed \$26,000 from my sister and mother to cover these costs.

11 Evan Spiegel, attorney for Michael Jackson, presented to me a contract where-
12 by I turned over all intellectual properties in return for Evan’s promise that he
13 would continue to police and protect the domain names for the next 3 years.

14 Evan Spiegel, on behalf of Michael Jackson, breached this term in the agree-
15 ment and let all of these domain names slip back into the public domain where
16 they were usurped by third parties.

17 I was devastated. I then began to do the work that Michael’s attorney should
18 have been doing and the work that Michael Jackson, through his attorney, Bri-
19 an Oxman, specifically asked me and directed me to do. This protecting of Mi-
20 chael’s Charity, the related domain names, and related trademarks, are the
21 subject matter of the instant lawsuit. I will be happy to turn over all these
22 marks to the Heal The World charity as Michael directed me to do. But I was
23 informed by Evan Spiegel and other representatives of Michael Jackson after
24 his death that they were not interested in his charity and didn’t need the do-
25 main names.

26 Although Michael had left 20% of his wealth to charity, Evan Spiegel and John
27 Branca, and other representatives of Michael’s Estate, have rejected his wishes
28

1
2 and intent to have this charity be run my his children and family and continue
3 in perpetuity.

4 19. Other HTWF domains were transferred in 2004 to Jackson's intellec-
5 tual property attorney Evan Spiegel, including the healthworld.biz and
6 healthworld.info in late March, at the very same time as the media was report-
7 ing the foundation was defunct (see Ex. I). After Jackson was booked (see Ex.J)
8 and arraigned (see Ex.K), but before Jackson was indicted in April 2004 (see
9 Ex. III, pg.5 of 13), a non-related party Heal the World Inc. filed to incorporate a
10 charity similar in name to HTWF's in January 2004. (Heal the World, Inc.)

11 20. Starting in 2003, Evan Spiegel, the lawyer handling Jackson's do-
12 main property, failed to honor Jackson's contract by renewing all the names
13 listed within it (around 550 names). He also failed to renew other names he
14 took possession of, another 350 or so names. Many of the names he subse-
15 quently lost to public circulation. I scrambled to recapture the property as it
16 dropped into public circulation and/or repurchased as many as I could afford
17 and again handed them over to Mr. Spiegel's care (see Ex.L).

18 21. In a letter in support of the Estate's preliminary injunction 2/18/10,
19 Spiegel mischaracterizes my efforts to donate the domains to the charity as
20 some intent to profit. Mr. Spiegel left out parts from the correspondence he in-
21 cluded in his declaration, to give the impression that I sold the domains, in-
22 stead of bringing attention to his own negligence, forcing me to have family
23 members front MJJ Productions a stop-gap loan to pay the 2003 renewal fees
24 because Mr. Spiegel did not renew the names before a deadline that meant they
25 were now particularly expensive to renew (i.e. domain registrar jargon calls
26 names with this status as having "dropped into redemption"). This was
27 brought to Spiegel's attention in an email I wrote to him in September 2004
28 which reads in part,

1
2 22. "...Further, the names were detained and delayed in transfer to you
3 because the domain fees were **not paid** in time as Mr. Backerman and I were
4 assured, before the names expired and were locked down into redemption. (**I be-**
5 **lieve we were waiting on you to finish the contract and get the payment**
6 **for their renewal**) I was forced to renew them all at my expense and that is
7 what MJJ Productions was reimbursing me for (they **weren't** purchasing the
8 names from me as you've treated it, they were a **donation** to his charity) and
9 many of the names were not included in the original contract. Again, this was not
10 my error, but rather those who were **writing up** the contract. (**I believe that**
11 **was you**)...." [bold in original. See Ex.MMM] Jackson possessed the domain
12 collection starting in 2003, and was paying for the up and coming year of his
13 possession, not my own.

14 23. Despite this added expense stemming from Mr. Spiegel's neglectful-
15 ness, a worse case scenario would be a later deadline where the names would
16 drop into public circulation, with any number of them have the potential of be-
17 ing bought by the public and possibly lost forever.

18 24. Jackson understood this and reimbursed my family directly, for the
19 exact amount of the stop-gap loan that made it possible for him to make his
20 2003 renewal and take possession of the names (no mark ups). The contract
21 also explains that Jackson would renew the names until May 2006. Jackson
22 acknowledged my concern when language was added to our contract, which
23 reads in part, "2.4 Jackson desires to protect the efforts of Johnson in Securing
24 the Domain Names from the open market...."

25 25. In early 2005, I met with Brian Oxman, Michael's then attorney and
26 the 25-year attorney for the Jackson family. He explained to me that Jackson
27 wanted me take the charity over completely, meaning he did not want to be the
28 permanent director. I was a bit concerned at this but learned that Jackson

1
2 wanted HTWF protected. Oxman told me that Jackson said I could secure the
3 charity's copyrights, trademarks and domains as needed, but he wanted to
4 have a hands-off role for a while. Oxman and another Jackson agent told me
5 that Jackson was putting his financial house in order just in case the criminal
6 prosecution did not go well for him.

7 26. Around this time, many of the charity and initiative domains were
8 also pointed to Jackson's official site at the time, mjjsource.com, as can be
9 verified by archive.org, an independent third-party service that takes screen-
10 shots of websites dating back over a decade (see Ex.M). This site and one simi-
11 lar service has screenshots showing my Heal the World Foundation websites
12 online for the past ten years, since 2001 to present day and at no time, has an-
13 yone in Jackson's camp ever asked me to remove any of the Jackson content.

14 27. Many of my emails during this same time period show my extensive
15 and ongoing relationship with various Jackson reps, many of these emails also
16 referencing various phone conversations I had with them. I presented into evi-
17 dence about 120 emails/letters with Jackson's reps, which averages out at
18 about one per month over a ten year period. On top of this, a number of other
19 emails that show me discussing my relationship with Jackson's camp, me
20 turning down domain offers for HTWF's domain names, or highlight my efforts
21 to protect Jackson's trademarks (see Ex.N, Mike Snyder's email; also see Ex.O,
22 Robinson's email) have also been entered into evidence.

23 28. Despite my 2005 permissions, without the funds that the charity's
24 various initiatives needed to properly develop into action and launch, no large
25 undertaking was possible at the time. I was able to continue to run a heal the
26 world half-way house near Palm Springs California, but this was a scaled-down
27 and low-key effort, despite helping many people with a small volunteer staff un-
28 til 2009 (see Ex.Q).

1
2 29. I wanted to wait until the trial was over, as I hoped that Mr. Jackson
3 would change his mind about not being on the Board of Directors. When the
4 trial was over, Mr. Jackson had been so traumatized, that I was told he needed
5 to get away and no one could say what he would do next. I simply continued
6 with my work developing the initiatives that are at the heart of the charity.

7 30. When the initiatives are fully operational they will define the daily
8 efforts of Heal the World Foundation. Some like Michael's Army were opera-
9 tional before this lawsuit was filed (see Ex.R). The charity's current claim to
10 using Jackson's likeness and image goes along with Jackson's desire to pre-
11 serve the charity's through my proprietary infrastructure. I sent various Jack-
12 son reps, updated and multiple versions of the HTWF book (see Ex.S), the basis
13 for which Oxman explains that Jackson gave me the go ahead to protect the
14 charity's trademarks.

15 31. The initiatives of the charity are not loosely related to Michael Jack-
16 son, but are by their very nature reliant on him, on the very person he repre-
17 sents. His graciousness and compassion are a big part of why his fans are so
18 loyal, and this goodness ties these initiatives to HTWF's larger stated service
19 and character improvement mission. The initiatives are not simply ASSOCIAT-
20 ED with Jackson (thousands of pages sent to Jackson over the years), but
21 many of these initiatives are specifically NAMED for Jackson.

22 32. **The adjectival names "MJ", "Michael" and "Michael Jackson"**
23 **are part of the title of these initiatives, along with the names of various**
24 **adjunct organizations** that will eventually be created to spearhead each initia-
25 tive. The below table references an exhibit (see Ex. T), showing content from a
26 2002 version of the book (see Ex. G). In Ex. T, various initiatives or organiza-
27 tions associated with the name MJ, Michael and Michael Jackson are peppered
28 throughout. They all relate to the name, likeness or image of Michael Jackson.

Again, many similar books with reiterated content were sent to Jackson over the years (see Ex.S).

33. Examples taken from this October 2002 material were bates numbered by Jackson Estate attorneys and supplied to Heal the World Foundation. See Ex.T to see examples in the 2002 material referenced in **Table 1** below:

Table 1.

Part of Name/Title	Bates Number	Initiative Name	Organization
MJ	HTWF 004048	MJ's Kids	
MJ	HTWF 004024		MJ Film Co.
MJ	HTWF 004039; HTWF 004041	MJ Pictures	MJ Movie Production Co.
MJ	HTWF 004046		MJTV Networks
MJ	HTWF 004055		MJ Magazines
MJ	HTWF 004063	MJ Radio	MJ Radio Networks
MJ		MJTV	
MJ		PLANETMJ	RPG/CARDS
MJ	HTWF 003995		MJ TV Networks
MJ	HTWF 003986		MJ Music Co.
MJ	HTWF 003986		MJ Newspaper Company

Michael	HTWF 004023	Michael's Army	
Michael	HTWF 004032	Michael's Kids	
Michael	HTWF 004054	"Michael" (an MJ Magazine)	(assoc. with "Multiple Magazine Companies")
Michael Jackson	HTWF 004001; HTWF 004008	Michael Jackson Telethon	
Michael Jackson	HTWF 004033	Michael Jackson Movies	(a series of seven full-length motion pictures)

34. Throughout the last decade I have vigilantly protected HTWF's intellectually property, refusing to sell the domain name collection I had to re-acquire after Spiegel abandoned them in 2003, 2004 and 2005, despite my contract with Jackson and MJJ Productions that said they would be renewed until 2006 (see Ex. U). My one exception to this rule was when I offered to sell a domain at a premium (\$4,500) to one potential buyer in order to secure well over a dozen trademarks related to its initiatives.

35. I shared my reasons to the potential buyer, explaining that his purchase would go toward protecting the HTWF's trademarks (Ex. V), but, unfortunately, he did not end up buying the domain name. You can see in concert with the email to

Jackson's intellectual property attorney, that I wanted to share the financial burden (Ex. Y, near the bottom) between Jackson and I, to protect the Michael, MJ and Michael Jackson trademarks related to the charity's initiatives and would have done more than the three MJ marks, had I had sufficient resources to do so. But the charity's domains renewals were exacting a financial toll I could not afford to shoulder on my own.

36. The below clarifies still further my efforts to protect the Michael Jackson names related to the charity. I had already submitted ten HTWF/MJ trademarks applications prior to this time. I wanted to apply for 16 Michael trademarks under the categories MJ, Michael and Michael Jackson, but he explained he had no money to help out. I also wrote to Michael Jackson's intellectual property lawyer Julian Petty and told him he should protect seven "Michael Jackson" trademarks in specific categories. Without specifying which ones, I told Mr. Petty to also apply for various "MJ" and "Michael" trademarks. I told Mr. Petty that I was "trying to preserve some of the MJ marks." I had already applied for three "MJ" marks at this stage, but none had progressed through to registration.

37. Table 2. is used to help clarify which Jackson-initiative charity trademarks I had secured, and which ones I had sought to secure on behalf of the charity. I elaborate on the content of this table below.

Table 2. 2008 Trademark Acquisition Efforts

Michael Jackson (international classes in 2008 in black I wanted, in gray Triumph already secured in 2004)	(1) 003 009** (Triumph) (2) 014 (3) 016 (4) 025 (5) 026 (6) 028 (7) 041
MJ (international classes in 2008 in black I wanted, in gray already applied for)	009* (Johnson) (8) 016

	025* (Johnson) 028* (Johnson) (9) 026 (10) 041
Michael (international classes in 2008 in black I wanted, in gray already applied for)	(11) 009 (12) 016 (13) 018 (14) 025 (15) 026 (16) 028

*Protected by Melissa Johnson in June/July 2008

**Renewed in Sept. 2004 (by Triumph c/o Malnik)

38. The 8/7/08 email (see Ex. Y) to Julian Petty, Jackson’s intellectual property attorney mentioned earlier, shows me asking Jackson’s lawyer to protect the seven “Michael Jackson” trademarks in Petty’s email, which are also restated in the above in table.

39. Petty was also asked, without me specifying which ones, to help me secure Jackson’s “MJ” names. I had already protected three of the “MJ” names in the table in June-July 2008 (grayed out) and the first three other MJ names I protect after Jackson’s death (died 6-25-09) are in the 016, 026 and 041 as shown in the table. It was this list of sixteen or so name I had in mind when I contacted MELISSA JOHNSON about applying for the Michael Jackson, Michael and MJ names around the end of summer 2008.

40. I further ask Mr. Petty in the email, again without specifying which ones, to help me secure Jackson’s “Michael” names. The very first name I protect after Jackson’s death is “Michael” (part of the HTWF initiative of Michael’s Army and Michael’s Kids), and the name “Michael” I already had used in commerce well before Jackson’s death

1 (Ex.OOO). After Jackson's death, I followed the same pattern when
2 securing various categories of "Michael" names as I did with "MJ"
3 names, except I choose to protect class Michael 018 instead of 041
4 (again see the above table).
5

6
7 41. I was talking with Petty and others about securing Jackson names, I
8 was referring to the Jackson names related specifically to the charity, not simply
9 any Jackson name. Finally after Jackson's death, and after taking care of
10 these charity-initiative names first, then I started to protect names less priority
11 with the charity in response to people hijacking Jackson's brands and the Estate
12 executors continually doing nothing until 8/17/09. Below is a hoard of
13 Jackson trademark bootleggers who ratchet up their efforts the day Mr. Jackson
14 died. I have stopped at 127 and the list indicates that with the world-wide
15 media focused on Jackson after his death, that most of this list happens in the
16 months following it, not the decade plus before it. 127 reasons I had an obligation
17 to protect the charity assets.

18 42. **A List of 200 Applications of People Applying for Jackson**
19 **Trademarks.** The following chart indicates third parties, unrelated to MJ or
20 HTWF in any way, who were taking advantage of the lack of policing and protection
21 by Michael's attorneys, which resulted in many important trademarks
22 slipping into the public domain, making them available to anyone for profiteering
23 and preventing their use for fundraising for the Charity:

- 24
- 25 • 1 THRILLER 3/6/1986 007/ "Turchan Enterprises, Inc., USA"
 - 26 • 2 THRILLER 2/9/1989 028/ "SUICK LURE MANUFACTURERS, USA"
 - 27 • 3 THRILLER CHILLER 11/20/1991 030/ "Simco Sales Service of
28 Pennsylvania, Inc. 310

- 1 • 4 THRILLER 6/15/1992 009/ "AMERICAN RECREATION GROUP
- 2 COMMACK ,11725 "
- 3
- 4 • 5 THRILLER 8/4/1993 012/ "Halfords B.V., Netherlands"
- 5
- 6 • 6 THRILLER 8/4/1993 021/ "Halfords B.V., Netherlands"
- 7
- 8 • 7 THRILLER 1/20/1994 012/ "Halfords B.V., Netherlands"
- 9
- 10 • 8 THRILLER 1/20/1994 021/ "Halfords B.V., Netherlands"
- 11
- 12 • 9 MOONWALK 4/4/1995 028/ "Moon-Walk Enterprises Co.
- 13 Inc.10150 Joy Road Plymouth, 481
- 14
- 15 • 10 THRILLER 6/13/1995 032/ "Norm D. St. Landau Tucker, Flyer &
- 16 Lewis 1615 L Street,
- 17
- 18 • 11 BILLY JEANS 6/21/1996 025/ "Bugle Boy Industries, Inc. 2900
- 19 MADERA ROAD SIMI VALLEY
- 20
- 21 • 12 Thriller\$ 1/6/1997 035/ "Trion, Inc. 101 McNeill Road Sanford,
- 22 273310760
- 23
- 24 • 13 THRILLER 3/18/1997 003/ "BONSMANN & BONSMANN, Germa-
- 25 ny"
- 26
- 27 • 14 THRILLER 3/18/1997 025/ "BONSMANN & BONSMANN, Germa-
- 28 ny"
- 15 Thrillermax 1/26/1999 041/ "Home Box Office, Inc. 1100 AVE OF
- THE AMERICAS NEW YORK ,
- 16 "THRILLER, GINSENG " 3/17/1999 005/ "Pacific Packaging Con-
- cepts, Inc., USA"

- 1 • 17 NEVERLAND 8/17/1999 025/ "STK 2-7-9 Hyakunin-Chiyo Shin-
- 2 juku-Ku, Tokyo, 169-0073
- 3
- 4 • 18 THRILLER DOME 11/30/1999 025/ "Voltura, Marc 3115 W. Aven-
- 5 ida Cresta Tucson ,85745 "
- 6
- 7 • 19 "KING OF POP, Hintellectual property HOP THE " 6/21/2000 032/
- 8 Williams Eric B.
- 9
- 10 • 20 THRILLER 7/3/2000 041/ "CLIFFORD DELIVERY SERVICES 3995
- 11 Alpine Valley Circle
- 12
- 13 • 21 THRILLER A DANCE ODYSSEY 7/3/2000 041/ "CLIFFORD DE-
- 14 LIVERY SERVICES 3995 Alpine
- 15
- 16 • 22 THRILLER 11/10/2000 041/ "UNIVERSAL INNOVATIONS, LLC"
- 17
- 18 • 23 MJ 1/22/2001 019/ "Midwest Jobbers, Inc., USA"
- 19
- 20 • 24 NEVERLAND 1/9/2002 009/ JOWOOD PRODUCTIONS SOFT-
- 21 WARE AG Bahnhofstrasse 22
- 22
- 23 • 25 THRILLER 1/9/2002 012/ "Thriller Power Boats, Inc., USA"
- 24
- 25 • 26 "NEVERLAND, DISNEY'S RETURN TO " 1/17/2002 016/ "Disney
- 26 Enterprises, Inc."
- 27
- 28 • 27 THRILLER 5/23/2002 003/ "Rose, Feliecea 3530 Rochambeau Ave
- Bronx , 10467 "
- 28 NEVERLAND FILMS 6/10/2002 041/ "Neverland Films, Inc."
- 29 Neverland Toys 9/14/2002 028/ "Strickler, Wayne T. USA"
- 30 NEVERLAND 1/9/2003 041/ "Dupree, Sherri 221 E. Wells Street
- Tyler, 75701 "

- 1 • 31 "KING OF POP, Hintellectual property HOP THE " 5/20/2003 032/
2 Williams Eric B.
- 3
- 4 • 32 "MJ, Simply " 11/29/2003 016/ "Butters, Mary Jane, USA"
- 5
- 6 • 33 MJ FIELD LOK 5/11/2004 006/ "United States Pipe and Foundry
7 Company, LLC LTD"
- 8
- 9 • 34 THRILLER 7/8/2004 032/ "Wingate, Jr., John Walker #52 Minne-
10 apolis ,55416 "
- 11
- 12 • 35 MJ MAGIC 7/19/2004 003/ "TOMJAI ENTERPRISES CORP., USA"
- 13
- 14 • 36 "MJ, letters/logo" 12/2/2004 014/ "Millenium Jewels BVBA, Bel-
15 gium"
- 16
- 17 • 37 MJ 6/2/2005 020/ "TENGZHOU SHENGQUAN ARTS CO., LTD
18 China"
- 19
- 20 • 38 MOONWALK 9/9/2005 009/ Moonwalk Universal Pty Ltd PO Box
21 1156
- 22
- 23 • 39 MOONWALK 9/9/2005 042/ Moonwalk Universal Pty Ltd PO Box
24 1156
- 25
- 26 • 40 NEVERLAND PARK 9/19/2005 009/ "Ares S.A., Argentina"
- 27
- 28 • 41 NEVERLAND PARK 9/19/2005 028/ "Ares S.A., Argentina"
- 42 NEVERLAND PARK 9/19/2005 041/ "Ares S.A., Argentina"
- 43 "MJ'S KITCHEN KREATIONS VICKSBURG, MS, LLC" 6/21/2006
030/ "MJ'S KITCHEN KREATION
- 44 THRILLER 7/3/2006 031/ "Ernst Benary Samenzucht GmbH,
Germany"

- 1 • 45 MJ 8/9/2006 032/ "S.C. STANDARD SNACKS S.R.L., Romania"
- 2
- 3 • 46 "MJ, letters/logo" 10/12/2006 014/ "Soule, Morgan Jean, USA"
- 4
- 5 • 47 MOONWALK 10/27/2006 003/ "Gap (Apparel), LLC 2 FOLSOM
- 6 STREET SAN FRANCISCO, 94105 "
- 7
- 8 • 48 BILLY JEANS 4/27/2007 025/ "Binder Salem Co. Inc. 217 East
- 9 157th Street Gardena ,90248
- 10
- 11 • 49 "heal the world!, Got teeth? Let your smile help " 5/23/2007 044/
- 12 "American Grinds,
- 13
- 14 • 50 THRILLER 7/3/2007 031/ Russell D. Orkin THE WEBB LAW FIRM
- 15 700 KOPPERS BUILDING
- 16
- 17 • 51 NEVERLAND PARK 7/10/2007 025/ "Valdivieso Dante, USA"
- 18
- 19 • 52 Thriller Box 8/1/2007 038/ "UNIVERSAL CITY STUDIOS LLLP,
- 20 USA"
- 21
- 22 • 53 "Thriller, Zone " 8/22/2007 016/ "Zonemedia Broadcasting Lim-
- 23 ited, UK"
- 24
- 25 • 54 "Thriller, Zone " 8/22/2007 038/ "Zonemedia Broadcasting Lim-
- 26 ited, UK"
- 27
- 28 • 55 "Thriller, Zone " 8/22/2007 041/ "Zonemedia Broadcasting Lim-
- ited, UK"
- 56 THRILLER 9/11/2007 not specified "Ernst Benary Samenzucht GmbH, Germany/Canada"
- 57 THRILLER 11/9/2007 031/ "Ernst Benary Samenzucht GmbH, Germany"

- 1 • 58 MJ HEALTHMERICA HEALTHMERICA 11/19/2007 005/
2 "HEALTHMERICA CORPORATION, USA"
- 3
- 4 • 59 "NEVERLAND TRAVEL, OFF TO " 1/2/2008 039/ "Off to Neverland
5 Travel, LLC"
- 6
- 7 • 60 NEVERLAND 1/16/2008 041/ "Nichols, Carl 135 Main Street,
8 Suite 1350 San Francisco ,
- 9
- 10 • 61 NEVERLAND 1/16/2008 043/ "Nichols, Carl 135 Main Street,
11 Suite 1350 San Francisco ,
- 12
- 13 • 62 HEAL THE WORLD 2/27/2008 036/ Roberts John W.
- 14
- 15 • 63 THRILLER 3/11/2008 028/ "Warrior Sports, Inc., USA"
- 16
- 17 • 64 MJ'S 5/28/2008 010/ "Mommy Jammies, LLC USA"
- 18
- 19 • 65 MJ ASSIST 6/16/2008 003/ "Doterra Holdings, LLC, USA"
- 20
- 21 • 66 MJ ASSIST 6/16/2008 005/ "Doterra Holdings, LLC, USA"
- 22
- 23 • 67 MJ Gold 7/21/2008 030/ "Brandone, Michael USA"
- 24
- 25 • 68 "heal the world, Heal yourself, " 10/28/2008 041/ "Robinson, The-
26 odore W."
- 27
- 28 • 69 "heal the world, Heal yourself, " 10/28/2008 045/ "Robinson, The-
odore W."
- 70 THRILLER 2/24/2009 not specified "Honey N Sugar Inc., Canada"
- 71 MJ 4/14/2009 018/ "Marc Joseph NY, Inc., USA"
- 72 MJ 4/14/2009 025/ "Marc Joseph NY, Inc., USA"

- 1 • 73 MOONWALK 5/1/2009 010/ "Surgical, medical, dental, and veter-
- 2 inary apparatus
- 3
- 4 • 74 MJ'S CHILDREN'S GLIOMA CANCER FOUNDATION 5/28/2009
- 5 041/ "Marc Apodaca Jr. Children
- 6

7 **Michael Jackson's Passing 6/25/09-Above Third-Party US (mostly)**

- 8 • **Michael Jackson's Passing 6/25/09-Below Third-Party US (most-**
- 9 **ly)** 1 KING OF POP 6/25/2009 025/ "Gene Therapy Group Inc
- 10 17 Skyview North Haledon ,07508
- 11 • 2 MJ'S MEMORIAL 6/26/2009 036/ shiloh dove shiloh dove
- 12 • 3 KING OF POP 6/29/2009 014/ 1a "The Bradford Exchange, Ltd. 9333
- 13 Milwaukee Avenue
- 14 • 4 KING OF POP 6/29/2009 020/ 1a "The Bradford Exchange, Ltd. 9333
- 15 Milwaukee Avenue
- 16 • 5 KING OF POP 6/29/2009 021/ 1a "The Bradford Exchange, Ltd. 9333
- 17 Milwaukee Avenue
- 18 • 6 KING OF POP 6/29/2009 025/ Jonathan Ware
- 19 • 7 KING OF POP 6/29/2009 025/ 1a "The Bradford Exchange, Ltd. 9333
- 20 Milwaukee Avenue
- 21 • 8 KING OF POP 6/29/2009 028/ 1a "The Bradford Exchange, Ltd. 9333
- 22 Milwaukee Avenue
- 23 • 9 MICHAEL JACKSON 6/29/2009 014/ "Rafael De las Heras Rodriguez,
- 24 Spain"
- 25
- 26
- 27
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- 1 • 10 MICHAEL JACKSON 6/29/2009 025/ "Rafael De las Heras Rodriguez,
2 Spain"
- 3
- 4 • 11 KING OF POP 7/1/2009 015/ 1a "The Bradford Exchange, Ltd. 9333
5 Milwaukee Avenue
- 6 • 12 KING OF POP 7/1/2009 016/ 1a "The Bradford Exchange, Ltd. 9333
7 Milwaukee Avenue
- 8 • 13 KING OF POP 7/1/2009 018/ 1a "The Bradford Exchange, Ltd. 9333
9 Milwaukee Avenue
- 10 • 14 KING OF POP 7/1/2009 020/ 1a "The Bradford Exchange, Ltd. 9333
11 Milwaukee Avenue
- 12 • 15 KING OF POP 7/1/2009 021/ 1a "The Bradford Exchange, Ltd. 9333
13 Milwaukee Avenue
- 14 • 16 KING OF POP 7/1/2009 028/ 1a "The Bradford Exchange, Ltd. 9333
15 Milwaukee Avenue
- 16 • 17 NEVERLAND 7/1/2009 041/ "Mark O'Hara, USA"
- 17 • 18 NEVERLAND PARK 7/2/2009 035/ "Leticia Uvalle, USA"
- 18 • 19 King of Pop The Show 7/3/2009 041/ "Act Entertainment AG, Swit-
19 zerland"
- 20 • 20 "MJ, Generation " 7/4/2009 025/ "Gene Therapy Group Inc., USA"
- 21 • 21 KING OF POP 7/6/2009 016/ "Tristar Products, Inc. 492 ROUTE 46
22 EAST FAIRFAX, 07004 "
- 23 • 22 Thriller Live 7/6/2009 009/ "The Flying Music Company Ltd., UK"
- 24 • 23 Thriller Live 7/6/2009 025/ "The Flying Music Company Ltd., UK"
- 25
- 26
- 27
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- 1 • 24 Thriller Live 7/6/2009 041/ "The Flying Music Company Ltd., UK"
- 2
- 3 • 25 KING OF POP 7/7/2009 016/ "TUTM ENTERTAINMENT, INC. 45
- 4 FERNWOOD AVENUE EDISON , 08837
- 5 • 26 KING OF POP 7/7/2009 021/ "TUTM ENTERTAINMENT, INC. 45
- 6 FERNWOOD AVENUE EDISON , 08837
- 7
- 8 • 27 KING OF POP 7/7/2009 025/ "TUTM ENTERTAINMENT, INC. 45
- 9 FERNWOOD AVENUE EDISON , 08837
- 10 • 28 KING OF POP 7/7/2009 028/ "TUTM ENTERTAINMENT, INC. 45
- 11 FERNWOOD AVENUE EDISON , 08837
- 12 • 29 KING OF POP 7/8/2009 016/ "TUTM ENTERTAINMENT, INC. 45
- 13 FERNWOOD AVENUE EDISON , 08837
- 14
- 15 • 30 THRILLER 7/9/2009 009/ "Rod Temperton c/o Greenberg Traurig,
- 16 LLP Santa Monica,
- 17 • 31 NEVERLAND RANCH 7/10/2009 025/ "Barreto Jose 1825 Ponce De
- 18 Leon Blvd, #414 Coral
- 19
- 20 • 32 BILLY JEAN 7/15/2009 003/ "Pamela Kidd, Paige Linn, USA"
- 21 • 33 BILLY JEAN 7/15/2009 009/ "Pamela Kidd, Paige Linn, USA"
- 22 • 34 BILLY JEAN 7/15/2009 014/ "Pamela Kidd, Paige Linn, USA"
- 23 • 35 BILLY JEAN 7/15/2009 015/ "Pamela Kidd, Paige Linn, USA"
- 24 • 36 BILLY JEAN 7/15/2009 016/ "Pamela Kidd, Paige Linn, USA"
- 25
- 26 • 37 BILLY JEAN 7/15/2009 018/ "Pamela Kidd, Paige Linn, USA"
- 27 • 38 BILLY JEAN 7/15/2009 021/ "Pamela Kidd, Paige Linn, USA"
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- 39 BILLY JEAN 7/15/2009 024/ "Pamela Kidd, Paige Linn, USA"
- 40 BILLY JEAN 7/15/2009 025/ "Pamela Kidd, Paige Linn, USA"
- 41 BILLY JEAN 7/15/2009 026/ "Pamela Kidd, Paige Linn, USA"
- 42 BILLY JEAN 7/15/2009 028/ "Pamela Kidd, Paige Linn, USA"
- 43 BILLY JEAN 7/15/2009 035/ "Pamela Kidd, Paige Linn, USA"
- 44 BILLY JEAN 7/15/2009 036/ "Pamela Kidd, Paige Linn, USA"
- 45 MOONWALK 7/15/2009 003/ "Pamela Kidd, Paige Linn, USA"
- 46 MOONWALK 7/15/2009 009/ "Pamela Kidd, Paige Linn, USA"
- 47 MOONWALK 7/15/2009 014/ "Pamela Kidd, Paige Linn, USA"
- 48 MOONWALK 7/15/2009 015/ "Pamela Kidd, Paige Linn, USA"
- 49 MOONWALK 7/15/2009 016/ "Pamela Kidd, Paige Linn, USA"
- 50 MOONWALK 7/15/2009 018/ "Pamela Kidd, Paige Linn, USA"
- 51 MOONWALK 7/15/2009 021/ "Pamela Kidd, Paige Linn, USA"
- 52 MOONWALK 7/15/2009 024/ "Pamela Kidd, Paige Linn, USA"
- 53 MOONWALK 7/15/2009 025/ "Pamela Kidd, Paige Linn, USA"
- 54 MOONWALK 7/15/2009 026/ "Pamela Kidd, Paige Linn, USA"
- 55 MOONWALK 7/15/2009 028/ "Pamela Kidd, Paige Linn, USA"
- 56 MOONWALK 7/15/2009 035/ "Pamela Kidd, Paige Linn, USA"
- 57 MOONWALK 7/15/2009 036/ "Pamela Kidd, Paige Linn, USA"
- 58 NEVERLAND 7/16/2009 003/ "Pamela Kidd, Paige Linn, USA"
- 59 NEVERLAND 7/16/2009 009/ "Pamela Kidd, Paige Linn, USA"
- 60 NEVERLAND 7/16/2009 014/ "Pamela Kidd, Paige Linn, USA"

- 1 • 61 NEVERLAND 7/16/2009 015/ "Pamela Kidd, Paige Linn, USA"
- 2 • 62 NEVERLAND 7/16/2009 016/ "Pamela Kidd, Paige Linn, USA"
- 3 • 63 NEVERLAND 7/16/2009 018/ "Pamela Kidd, Paige Linn, USA"
- 4 • 64 NEVERLAND 7/16/2009 021/ "Pamela Kidd, Paige Linn, USA"
- 5 • 65 NEVERLAND 7/16/2009 024/ "Pamela Kidd, Paige Linn, USA"
- 6 • 66 NEVERLAND 7/16/2009 025/ "Pamela Kidd, Paige Linn, USA"
- 7 • 67 NEVERLAND 7/16/2009 026/ "Pamela Kidd, Paige Linn, USA"
- 8 • 68 NEVERLAND 7/16/2009 028/ "Pamela Kidd, Paige Linn, USA"
- 9 • 69 NEVERLAND 7/16/2009 035/ "Pamela Kidd, Paige Linn, USA"
- 10 • 70 NEVERLAND 7/16/2009 036/ "Pamela Kidd, Paige Linn, USA"
- 11 • 71 NEVERLAND 7/19/2009 041/ "David Brown, USA"
- 12 • 72 NEVERLAND 7/19/2009 041/ "Whitfield, Anthony Suite 303 St. Lou-
- 13 is, 63108 "
- 14 • 73 NEVERLAND RANCH 7/19/2009 041/ "Whitfield, Anthony Suite 303
- 15 St. Louis, 63108 "
- 16 • 74 THRILLER 7/20/2009 009/ "Alan Koslow 3111 Stirling Road Fort
- 17 Lauderdale ,33312 "
- 18 • 75 KING OF POP 7/24/2009 003/ Kidd Pamela; Linn Paige
- 19 • 76 KING OF POP 7/24/2009 009/ Kidd Pamela; Linn Paige
- 20 • 77 KING OF POP 7/24/2009 014/ Kidd Pamela; Linn Paige
- 21 • 78 KING OF POP 7/24/2009 015/ Kidd Pamela; Linn Paige
- 22 • 79 KING OF POP 7/24/2009 016/ Kidd Pamela; Linn Paige

- 1 • 80 KING OF POP 7/24/2009 018/ Kidd Pamela; Linn Paige
- 2
- 3 • 81 KING OF POP 7/24/2009 021/ Kidd Pamela; Linn Paige
- 4
- 5 • 82 KING OF POP 7/24/2009 024/ Kidd Pamela; Linn Paige
- 6
- 7 • 83 KING OF POP 7/24/2009 025/ Kidd Pamela; Linn Paige
- 8
- 9 • 84 KING OF POP 7/24/2009 026/ Kidd Pamela; Linn Paige
- 10
- 11 • 85 KING OF POP 7/24/2009 028/ Kidd Pamela; Linn Paige
- 12
- 13 • 86 KING OF POP 7/24/2009 035/ Kidd Pamela; Linn Paige
- 14
- 15 • 87 KING OF POP 7/24/2009 036/ Kidd Pamela; Linn Paige
- 16
- 17 • 88 MICHAEL JACKSON 7/27/2009 27.5.13 "Rafael De las Heras
Rodriguez, Spain"
- 18
- 19 • 89 THE JACKSON THREE 7/28/2009 003/ "Pamela Kidd, Paige Linn,
USA"
- 20
- 21 • 90 THE JACKSON THREE 7/28/2009 009/ "Pamela Kidd, Paige Linn,
USA"
- 22
- 23 • 91 THE JACKSON THREE 7/28/2009 014/ "Pamela Kidd, Paige Linn,
USA"
- 24
- 25 • 92 THE JACKSON THREE 7/28/2009 015/ "Pamela Kidd, Paige Linn,
USA"
- 26
- 27 • 93 THE JACKSON THREE 7/28/2009 016/ "Pamela Kidd, Paige Linn,
USA"
- 28
- 94 THE JACKSON THREE 7/28/2009 018/ "Pamela Kidd, Paige Linn,
USA"

- 1 • 95 THE JACKSON THREE 7/28/2009 021/ "Pamela Kidd, Paige Linn,
2 USA"
- 3
- 4 • 96 THE JACKSON THREE 7/28/2009 024/ "Pamela Kidd, Paige Linn,
5 USA"
- 6
- 7 • 97 THE JACKSON THREE 7/28/2009 025/ "Pamela Kidd, Paige Linn,
8 USA"
- 9
- 10 • 98 THE JACKSON THREE 7/28/2009 026/ "Pamela Kidd, Paige Linn,
11 USA"
- 12
- 13 • 99 THE JACKSON THREE 7/28/2009 028/ "Pamela Kidd, Paige Linn,
14 USA"
- 15
- 16 • 100 THE JACKSON THREE 7/28/2009 035/ "Pamela Kidd, Paige Linn,
17 USA"
- 18
- 19 • 101 THE JACKSON THREE 7/28/2009 036/ "Pamela Kidd, Paige Linn,
20 USA"
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- 22 • 102 NEVERLAND 8/12/2009 016/ "Sycamore Valley Ranch Company
23 LLC 1999 Avenue of th
- 24
- 25 • 103 NEVERLAND 8/12/2009 025/ "Sycamore Valley Ranch Company
26 LLC 1999 Avenue of th
- 27
- 28 • 104 NEVERLAND 8/12/2009 035/ "Sycamore Valley Ranch Company
29 LLC 1999 Avenue of th
- 30
- 31 • 105 NEVERLAND RANCH 8/12/2009 016/ "Sycamore Valley Ranch
32 Company LLC 1999 Avenue of th

- 1 • 106 NEVERLAND RANCH 8/12/2009 025/ "Sycamore Valley Ranch
- 2 Company LLC 1999 Avenue of th
- 3
- 4 • 107 NEVERLAND RANCH 8/12/2009 028/ "Sycamore Valley Ranch
- 5 Company LLC 1999 Avenue of th
- 6
- 7 • 108 NEVERLAND RANCH 8/12/2009 035/ "Sycamore Valley Ranch
- 8 Company LLC 1999 Avenue of th
- 9
- 10 • 109 NEVERLAND RANCH 8/12/2009 041/ "Sycamore Valley Ranch
- 11 Company LLC 1999 Avenue of th
- 12
- 13 • 110 NEVERLAND RANCH RANCH 8/12/2009 016/ "Sycamore Valley
- 14 Ranch Company LLC 1999 Avenu
- 15
- 16 • 111 NEVERLAND RANCH RANCH 8/12/2009 025/ "Sycamore Valley
- 17 Ranch Company LLC 1999 Avenu
- 18
- 19 • 112 NEVERLAND RANCH RANCH 8/12/2009 028/ "Sycamore Valley
- 20 Ranch Company LLC 1999 Avenu
- 21
- 22 • 113 NEVERLAND RANCH RANCH 8/12/2009 035/ "Sycamore Valley
- 23 Ranch Company LLC 1999 Avenu
- 24
- 25 • 114 NEVERLAND RANCH RANCH 8/12/2009 041/ "Sycamore Valley
- 26 Ranch Company LLC 1999 Avenu
- 27
- 28 • 115 MJ NATURALLY AGED FLOORING 9/11/2009 019/ "J&M Dynamics
LLC, USA"
- 116 MJ 9/13/2009 042/ "Hitchcock, Kirstin USA"
- 117 MJ 9/29/2009/ 006/ "MJ-Gerüst GmbH, Germany"
- 118 MJ 9/29/2009/ 019/ "MJ-Gerüst GmbH, Germany"

- 1 • 119 MJ 9/29/2009/ 037/ "MJ-Gerüst GmbH, Germany"
- 2
- 3 • 120 Thriller Gummies 10/16/2009 030/ "Maxim Marketing Corp.Suite
- 4 203 San Dimas ,91773 "
- 5 • 121 NEVERLAND SWEETS EXPLORING THE WORLD'S FINEST SWEETS
- 6 10/26/2009 035/ "Neverland
- 7
- 8 • 122 NEVERLAND 11/23/2009 020/ "Hayward, Greg 5722 Telephone
- 9 Road, C12 #202 Ventura 93003
- 10 • 123 "KING OF POP FANVENTION, THE INTERNATIONAL " 11/25/2009
- 11 041/ Karen L. Williams 804
- 12 • 124 THRILLER 11/30/2009 032/ "Jackson, Jeremy 8952 St. Ives Los
- 13 Angeles 90069 "
- 14
- 15 • 125 THRILLER 12/1/2009 013/ 1a "Ingram Enterprises, Inc. 3010 N. In-
- 16 gram Drive
- 17 • 126 HEAL THE WORLD unsure unsure "Heal The World, Australia"
- 18

19 43. In 2006, I was mostly concerned with paying for the yearly cost of
20 HTWF's domain collection, although I had previously written to various reps
21 Jackson reps about Jackson-name trademarks, too. For years I communicated
22 with Van Alexander, yet, Evvy Tavasci in her declaration to secure the Estate
23 their temporary injunction, said she did not know Van Vroblesky (aka Van Al-
24 exander) and essentially knew pretty much everyone as Jackson's executive as-
25 sistant. In her declaration dated April 12, 2007, Tavasic says,

26 44. *"I am not aware of any person by the name of Alexander Vroblesky or*
27 *Van Vroblesky ever working ever working for a representative Mr. Jackson. I*
28 *have never heard of this person."*

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2 45. Now recall that Mr. Vroblesky was a Jackson rep who told me, in re-
3 sponse to an outside threat, to immediately secure HTWF's trademarks, incor-
4 poration and ultimately its 501c3 in 2008. And suddenly the Estate is supply-
5 ing testimony from a well-known, long-term Jackson rep who says that Mr.
6 Vroblesky is in fact NOT a Jackson rep. And since Mr. Vroblesky's support of
7 me concerning HTWF are at the heart of this case, our ability to stave off the
8 Plaintiff's preliminary injunction motion was at the time in serious jeopardy.
9 Nine months later, during the admissions process, the Estate executors' law-
10 yers were forced to concede the following:

11 *"...[the Jackson executors] admit that Mr. Vroblesky was employed*
12 *by Raymone Bain, rendered certain management services to Mr. Jackson*
13 *during 2006-2008..."* (see Ex.D no.12)

14 46. But even then they wish to hint that Raymone Bain's colleagues were
15 distant from Jackson, when the truth is Ms. Bain had been promoted from spokes-
16 person to the CEO of the Michael Jackson Company in May 2006.

17 47. But the damage had already been done and the Estate that shared a law-
18 yer with HTWF (see Ex.D no.16) knew about Mr. Vroblesky's actual role as a
19 Jackson rep, but the Estate executors sat on this information. By so doing, the ex-
20 ecutors allowed the temporary injunction to run its course, and all this while HTWF,
21 its volunteers and our reputations were shredded in the public (see Ex.DDD)
22 Our ability to raise money due to the extensive public distrust was and is near non-
23 existent. This enabled the Estate to also have a consistent legal presence, while
24 HTWF was unable to consistently retain counsel.

25 48. Alexander was the same man that encouraged me to get Heal the
26 World Foundation's and its initiatives trademarks to counter Heal the World Inc.'s
27 efforts to take them (see Ex.W) and I thanked him for encouraging me to get the
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2 foundation's 501c3 status, a task that originally seemed daunting to me. I write to
3 Van Alexander:

4 *"...I'm doing the app for the 501c3 myself. You were right, I should have done it*
5 *myself. I'll have it filed soon..."* (see Ex.KKK).

6 49. I expressed in my course of business with Jackson's intellectual property
7 lawyer, Julian Petty (see Ex.D), that I was trying to protect some of the MJ names
8 (see Ex.Y), associated with the charity's initiatives. I explained to him, however,
9 that I needed his help or the help of someone with similar expertise (see Ex.Y). He
10 did nothing. An enemy or outsider to Jackson's camp, or someone who does not
11 have permission to trademark Jackson brands, would not be asking his trademark
12 lawyers to help out or outright do it for HTWF and Jackson. The reason, is because
13 I thought Jackson trade marking a name, was the same as HTWF or myself trade
14 marking and securing a name. To my mind, what I did, was for him and he would
15 not keep me from using any of the marks, he locked down for the charity.

16 50. At the direction of Van Alexander, I did get a hold of the Venable law-
17 yer Mark Harrison, who in early September 2008 put in a request to extend the pe-
18 riod in which to file an opposition against a third-party's MJ 041 (see Ex.Z). This
19 MJ trademark was stopping the progress of my own MJ 009 mark, for the charity,
20 so I pushed Mr. Harrison to oppose the trademark before the extension expired
21 (which he did, see Ex.AA) and Mr. Harrison (retain by HTWF, see Ex.NNN) also
22 subsequently filed to protect my Heal the World 036 mark against the claims of the
23 non-Jackson charity Heal the World, Inc. (See Ex.BB.)

24 51. Mark Harrison and I worked together to defend and police the charity
25 marks for nearly a year before Jackson's death. His working for Triumph Interna-
26 tional Inc. and Michael Jackson, was the same as me/HTWF defending and policing
27 a mark. That is until Mr. Jackson died. After that, Mark Harrison turned on me,
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2 and filed an extension on the last day he could, to oppose my MJ 009 mark that he
3 had formerly help me protect and get pushed through toward registration. He
4 worked on behalf of the Jackson Estate executors, soon after this, he also granted
5 Heal the World Inc. an extension of time, contrary to my express wishes for him
6 NOT to grant any more extensions, because they appeared a day after Jackson's
7 death and started to threaten legal action.
8 *[I said] I don't want you to do **anything**, not give them [HTW Inc.] any-*
9 *thing, not give them anything, not discuss anything, I just want them to*
10 *give me some time. (see Ex.CC)*
11

12 52. As a result of Harrison's action, he empowered Heal the World Inc. to
13 file a counter claim three weeks after this Federal lawsuit was filed on 9/29/09.
14 This filing happened around the same time a California Attorney General's audit
15 dated 10/2/09 (see Ex.DD) was initiated against HTWF. Also, the HTWF Inc.
16 counter claim against HTWF was filed on 10/19/09 (see Ex.EE). Also on 10/19/09
17 Mark Harrison withdrew as HTWF's counsel (see Ex.FF). Also on 10/19/09, the
18 Estate started to file a battery of trademark opposition's against HTWF at the
19 USPTO (see Ex.GG). All these efforts, including those that involved this lawyer
20 Mark Harrison, which I shared with Jackson (see Ex.D no.16), were preceded by a
21 CBS news article in August 2009 and a press release the following month (see
22 Ex.II) asserting that I was somehow a deceiving interloper who had arrived on the
23 scene soon after Mr. Jackson's death, and, according to the CBS article, had "no
24 connection whatsoever" with Jackson's camp (see Ex.JJ).

25 53. After the temporary injunction was given in April 2010, the Estate law-
26 yer Vincent Chieffo, publicly reasserted what other Estate reps had done before
27 him, saying, "Michael had no ties to this Heal the World Foundation" (see
28

1
2 Ex.KK). But the Estate and I shared an attorney (see Ex.D), and I was directed to
3 this attorney by Jackson's manager, Van Alexander and Raymone Bain. And this
4 attorney helped me to defend the Heal the World Foundation's name trademark,
5 heal the world 036, (see Ex.BB) and also the trademark associated with many of its
6 initiatives (MJ 009) by opposing an MJ 041 application (see Ex.AA) to free up its
7 passage, before he turned against me as mentioned above.

8 54. Finally when Mark Harrison withdrew from representing HTWF in Oc-
9 tober 2009, he returned its books, but also accidentally sent HTWF a contract the
10 Estate executors had entered into with the Bradford Exchange.

11 55. This contract is dated 7/16/09 and Venable, the law firm of Mark Harri-
12 son, is listed in the contract as brokering the deal by having various King of Pop
13 trademarks assigned to the Estate Special Administrations (i.e. the Estate execu-
14 tors). The Estate executors lawyers maintain in their admissions paperwork only
15 Harrison had worked for Jackson *prior* to his death. They claim:
16 "*Mr. Harrison rendered legal services to Mr. Jackson during 2008 and in 2009*
17 ***prior*** to Mr. Jackson's death..." (bold added, see Ex. D, no.16)

18 56. Now that the Estate was caught red handed turning our own lawyer
19 against HTWF when he accidentally sent to HTWF the Bradford Exchange contract
20 linking the executors to the retaining of Venable LLC. This knowledge became
21 public, and so the Estate also asserted the following in a different batch of admis-
22 sions:

23 57. ...admit that one or more attorney's at Venable, LLP, **but not Mark**
24 **Harrison**, rendered legal services to the Special Administrators of the Estate
25 through May 5, 2010.... [bold added, Ex. E, no.14]

26 58. But Harrison electronically signed an Extension of Time to Oppose my
27 MJ 009 trademark on behalf of Triumph (the same co-plaintiff in this law suit
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2 against HTWF presided over by the Special Administrators) on 7/16/09, incidentally
3 on the same day as the Bradford Exchange contract and three weeks *after* Mr. Jack-
4 son's death (see Ex. LLL).

5 59. Despite my also suggesting to Petty that he get the "Be Like Mike"
6 trademark, I never used it in commerce or applied for it before or after Jack-
7 son's death. As if following the example of those before him, Petty protected
8 none of the above names for Michael Jackson.

9 60. As mentioned at length earlier, MJ, Michael and Michael Jackson
10 are intrinsic to the initiatives and mission of the charity.

11 61. Not only were the domain names I transferred in 2003 abandoned
12 (see Ex.KK), but I recently obtained paperwork from the California's Secretary
13 of State that reveals that MJJ Productions, the company contracted to keep the
14 names renewed, had also been abandoned/suspended "three times" itself (see
15 Ex.JJ), once by the Estate executors in 2010. (See Ex.LL.)

16 62. I also started to defend the charities trademarks starting with a
17 state service mark for HTWF in 2002 (see Ex.38). I shared this fact in emails
18 with two of Jackson's reps: (1) Stu Backerman (see Ex.D) Jackson's spokes-
19 man, who was instrumental in helping me to protect the domain collection,
20 and, (2) Al Malnik, who also played a role in the collection's preservation and
21 was Jackson's manager in 2003-2004 (see Ex.D). These emails about getting
22 the service marks protected are attached as Ex.PP and Ex.QQ. I told Brian
23 Oxman about the HTWF trademark I had secured for Heal the World, but many
24 were vulnerable at the USPTO for many years.

25 63. In response to an over zealous MJ fan who called me and said that if
26 he couldn't sell me his 1B trademark application (he had recently filed for Heal
27 the World 036 trademark) for \$5,000, he would instead sell it to a non-Jackson
28 charity (see Ex.X), Heal the World, Inc. (This is the same charity mentioned ear-

1
2 lier that appeared between Michael Jackson's arraignment and indictment pre-
3 ceding his 2005 trial, who incorporated their own heal the world name on 1-23-
4 04). This fan also said he planned to reincorporate the charity because Michael
5 Jackson had abandoned it.

6 64. I immediately contacted Van Alexander explaining the hijacking ef-
7 forts of this fan. Alexander than encouraged me to take immediate action that
8 lead to the revived Heal the World Foundation being formed, with its accompa-
9 nying trademarks and 501c3 status being reacquired throughout 2008 and in-
10 to January 2009. I asked for financial help from Van Alexander to cover the
11 expense of getting trademark applications filed, but he couldn't do so (see
12 Ex.SS). I asked Jackson's intellectual property attorney to cover the Michael
13 Jackson initiative names, including Michael Jackson, Michael and MJ (see
14 Ex.Y).

15 65. As mentioned at length earlier, MJ, Michael and Michael Jackson
16 are intrinsic to the initiatives and mission of the charity.

17 66. Names like Thriller were less related to the charity's initiatives, and I
18 only attempted to acquired those trademarks to protect Jackson's brand per se
19 (see Ex.X, some trademarks in this list were applied before Jackson's passing),
20 since a hoard of bootleggers who were having a field day hijacking Jackson
21 trademarks, were not being preempted by the Estate executors.
22 And all this despite more than four weeks elapsing from the time the Wall
23 Street Journal reported the Estate lawyers had gotten the rights to act on
24 Jackson's behalf (see Ex.X) and the Estate actually secured the marks them-
25 selves. Similarly, nearly three weeks elapsed from the time Estate lawyers in
26 admissions declare that they actually had the authority to act, and when they
27 actually did.
28

67. A trademark application takes only 30 minutes to submit online, it made no sense. Oddly enough, the Estate waited till August 17, 2009 to file their first trademark (see Ex.P), just over a month after they were given full authority. I later obtained documents from the California Secretary of State that show the Estate executors reinstated Triumph after it had been suspended between August 14, 2007 and August 14, 2009 (see Ex.WW).

68. I also later found in an article online, that square up with my own records I personally pulled from the USPTO, that over 180 of Jackson’s trademarks had been abandoned by Triumph, 175 of which were abandoned between November 1993 and November 1995, while John Branca was widely-known to be a senior advisor for Jackson.

69. Below is a table that coincides to the 521 pages that are a part of Ex. XX, by comparison a much more economical way to see the extent to which Triumph abandoned Jackson’s trademarks.

	Seri- al #	Trade- mark Name	Ap- plied	Aban- doned	Status	Yrs. Aban- doned
1	<u>7360</u> 7360	MICHAEL JACKSON	7/1/19 86	4/12/2 008	DEAD section 8	1.2
2	<u>7360</u> 7393	MICHAEL JACKSON	7/1/19 86	3/29/2 008	DEAD section 8	1.2
3	<u>7360</u> 7371	MICHAEL JACKSON	7/1/19 86	3/1/20 08	DEAD section 8	1.3
4	<u>7360</u> 7385	MICHAEL JACKSON	7/1/19 86	3/1/20 08	DEAD section 8	1.3
5	<u>7439</u> 8863	THE WORLD OF MICHAEL JACKSON AN INTERNA- TIONAL CLUB	6/7/19 93	11/24/ 1995	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.	13.6

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6	<u>7439</u> <u>9330</u>	MICHAEL JACKSON	6/7/1993	11/17/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	13.6
7	<u>7439</u> <u>9333</u>	MP [MICHAEL'S PETS]	6/7/1993	9/8/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	13.8
8	<u>7442</u> <u>0808</u>	NEVERLAND VALLEY	8/5/1993	8/1/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	13.9
9	<u>7439</u> <u>8857</u>	MICHAEL'S PETS	6/7/1993	5/30/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.1
10	<u>7439</u> <u>8866</u>	THE WORLD OF MICHAEL JACKSON AN INTERNATIONAL CLUB	6/7/1993	5/30/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.1
11	<u>7439</u> <u>8868</u>	THE WORLD OF MICHAEL JACKSON AN INTERNATIONAL CLUB	6/7/1993	5/30/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.1
12	<u>7452</u> <u>8192</u>	DANGEROUS	5/23/1994	5/26/1995	DEAD Abandoned: Applicant's express request.	14.1
13	<u>7452</u> <u>0967</u>	DANGEROUS	5/9/1994	4/20/1995	DEAD Abandoned after mark was published for opposition in the Official Gazette.	14.2
14	<u>7439</u> <u>8858</u>	THE WORLD OF MICHAEL JACKSON AN INTERNATIONAL CLUB	6/7/1993	4/19/1995	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.2

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2			THE WORLD			DEAD Abandoned: No
3			OF MICHAEL			Statement of Use filed
4	15	<u>7439</u> <u>8864</u>	JACKSON AN	6/7/19	4/19/1	after Notice of Allow-
5			INTERNATIONAL CLUB	93	995	ance was issued.
6						14.2
7	16	<u>7439</u> <u>8869</u>	THE WORLD	6/7/19	4/19/1	DEAD Abandoned: No
8			OF MICHAEL	93	995	Statement of Use filed
9			JACKSON AN			after Notice of Allow-
10			INTERNATIONAL CLUB			ance was issued.
11						14.2
12	17	<u>7439</u> <u>9332</u>	MICHAEL	6/7/19	4/19/1	DEAD Abandoned: No
13			JACKSON	93	995	Statement of Use filed
14						after Notice of Allow-
15						ance was issued.
16						14.2
17	18	<u>7439</u> <u>8854</u>	THE WORLD	6/7/19	4/12/1	DEAD Abandoned: No
18			OF MICHAEL	93	995	Statement of Use filed
19			JACKSON AN			after Notice of Allow-
20			INTERNATIONAL CLUB			ance was issued.
21						14.2
22	19	<u>7439</u> <u>8859</u>	THE WORLD	6/7/19	4/12/1	DEAD Abandoned: No
23			OF MICHAEL	93	995	Statement of Use filed
24			JACKSON AN			after Notice of Allow-
25			INTERNATIONAL CLUB			ance was issued.
26						14.2
27	20	<u>7439</u> <u>8860</u>	THE WORLD	6/7/19	4/12/1	DEAD Abandoned: No
28			OF MICHAEL	93	995	Statement of Use filed
			JACKSON AN			after Notice of Allow-
			INTERNATIONAL CLUB			ance was issued.
						14.2
	21	<u>7439</u> <u>8861</u>	THE WORLD	6/7/19	4/12/1	DEAD Abandoned: No
			OF MICHAEL	93	995	Statement of Use filed
			JACKSON AN			after Notice of Allow-
			INTERNATIONAL CLUB			ance was issued.
						14.2
	22	<u>7439</u> <u>8862</u>	THE WORLD	6/7/19	4/12/1	DEAD Abandoned: No
			OF MICHAEL	93	995	Statement of Use filed
			JACKSON AN			after Notice of Allow-
			INTERNATIONAL CLUB			ance was issued.
						14.2

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3	23	<u>7452</u> <u>0954</u>	DANGEROUS	5/9/19 94	4/10/1 995	DEAD Abandoned: Applicant's express request.	14.2
4							
5			THE WORLD OF MICHAEL JACKSON AN			DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
6	24	<u>7439</u> <u>8870</u>	INTERNA-	6/7/19 93	4/5/19 95		14.2
7			TIONAL CLUB				
8			THE WORLD OF MICHAEL JACKSON AN			DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
9	25	<u>7439</u> <u>8855</u>	INTERNA-	6/7/19 93	3/21/1 995		14.3
10			TIONAL CLUB				
11			THE WORLD OF MICHAEL JACKSON AN			DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
12	26	<u>7439</u> <u>8856</u>	INTERNA-	6/7/19 93	3/14/1 995		14.3
13			TIONAL CLUB				
14						DEAD Abandoned: Applicant's express request.	
15	27	<u>7452</u> <u>0865</u>	DANGEROUS	5/9/19 94	2/10/1 995		14.4
16							
17						DEAD Abandoned: Applicant's express request.	
18	28	<u>7452</u> <u>0966</u>	DANGEROUS	5/9/19 94	2/10/1 995		14.4
19							
20						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
21	29	<u>7413</u> <u>8783</u>		2/13/1 991	2/5/19 95		14.4
22							
23						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
24	30	<u>7439</u> <u>9350</u>	MP [MICHAEL'S PETS]	6/7/19 93	1/27/1 995		14.4
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31	<u>7438</u> <u>9422</u>	MICHAEL JACKSON	5/12/1 993	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
32	<u>7438</u> <u>9423</u>	MICHAEL JACKSON	5/12/1 993	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
33	<u>7438</u> <u>9582</u>	MICHAEL JACKSON	5/12/1 993	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
34	<u>7438</u> <u>9584</u>	MICHAEL JACKSON	5/12/1 993	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
35	<u>7438</u> <u>9585</u>	MP [MICHAEL'S PETS]	5/12/1 993	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
36	<u>7439</u> <u>9176</u>	MICHAEL JACKSON	6/7/19 93	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
37	<u>7439</u> <u>9328</u>	MICHAEL JACKSON	6/7/19 93	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
38	<u>7439</u> <u>9329</u>	MICHAEL JACKSON	6/7/19 93	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
39	<u>7439</u> <u>9331</u>	MICHAEL JACKSON	6/7/19 93	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
40	<u>7439</u> <u>9742</u>	MP [MICHAEL'S PETS]	6/7/19 93	1/17/1 995	DEAD Abandoned: Applicant's express request.	14.4
41	<u>7439</u> <u>8172</u>	MICHAEL JACKSON	6/3/19 93	12/9/1 994	DEAD Abandoned: Applicant's express request.	14.6

1					DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
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3	42	<u>7411</u> <u>7955</u>	NEVERLAND VALLEY	11/26/ 1990	11/13/ 1994	14.6
4						
5	43	<u>7411</u> <u>7960</u>	NEVERLAND VALLEY	11/26/ 1990	11/13/ 1994	14.6
6						
7	44	<u>7414</u> <u>6516</u>		3/11/1 991	10/29/ 1994	14.7
8						
9	45	<u>7414</u> <u>6517</u>	NEVERLAND VALLEY	3/11/1 991	10/29/ 1994	14.7
10						
11	46	<u>7413</u> <u>8786</u>		2/13/1 991	10/15/ 1994	14.7
12						
13	47	<u>7413</u> <u>8788</u>	NEVERLAND VALLEY	2/13/1 991	10/15/ 1994	14.7
14						
15	48	<u>7413</u> <u>8792</u>	NEVERLAND VALLEY	2/13/1 991	10/15/ 1994	14.7
16						
17	49	<u>7438</u> <u>4040</u>	MJ	4/29/1 993	10/13/ 1994	14.7
18						
19	50	<u>7414</u> <u>6512</u>		3/11/1 991	10/8/1 994	14.7
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ance was issued.

51	<u>7438</u> 4033	MP [MICHAEL'S PETS]	4/29/1 993	10/6/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
52	<u>7439</u> 8173	MICHAEL'S PETS	6/3/19 93	10/6/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
53	<u>7439</u> 8867	MICHAEL'S PETS	6/7/19 93	10/6/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
54	<u>7413</u> 8784		2/13/1 991	10/1/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
55	<u>7438</u> 4026	MP [MICHAEL'S PETS]	4/29/1 993	9/30/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
56	<u>7438</u> 4044	MJ	4/29/1 993	9/30/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.
57	<u>7438</u> 4028	MP [MICHAEL'S PETS]	4/29/1 993	9/23/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allow- ance was issued.

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3						DEAD Abandoned: No
4						Statement of Use filed
5	58	<u>7438</u> <u>4045</u>	MJ	4/29/1 993	9/23/1 994	after Notice of Allow- ance was issued.
6						14.8
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8	59	<u>7438</u> <u>4049</u>	MJ	4/29/1 993	9/23/1 994	DEAD Abandoned: No
9						Statement of Use filed
10						after Notice of Allow- ance was issued.
11	60	<u>7438</u> <u>4050</u>	MJ	4/29/1 993	9/23/1 994	14.8
12						
13						
14	61	<u>7413</u> <u>8779</u>		2/13/1 991	9/18/1 994	DEAD Abandoned: No
15						Statement of Use filed
16						after Notice of Allow- ance was issued.
17						14.8
18	62	<u>7438</u> <u>4027</u>	MP [MICHAEL'S PETS]	4/29/1 993	9/16/1 994	DEAD Abandoned: No
19						Statement of Use filed
20						after Notice of Allow- ance was issued.
21	63	<u>7438</u> <u>4043</u>	MJ	4/29/1 993	9/16/1 994	14.8
22						
23	64	<u>7439</u> <u>8175</u>	MP [MICHAEL'S PETS]	6/3/19 93	9/16/1 994	DEAD Abandoned: No
24						Statement of Use filed
25						after Notice of Allow- ance was issued.
26	65	<u>7414</u> <u>6515</u>	NEVERLAND VALLEY	3/11/1 991	9/11/1 994	14.8
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1						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
2							
3	66	<u>7439</u> <u>9741</u>	MP [MICHAEL'S PETS]	6/7/19 93	9/9/19 94		14.8
4							
5	67	<u>7438</u> <u>9583</u>	MP [MICHAEL'S PETS]	5/12/1 993	8/23/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.8
6							
7							
8	68	<u>7439</u> <u>8176</u>	MJ	6/3/19 93	8/23/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.8
9							
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13	69	<u>7434</u> <u>6548</u>	NEVERLAND VALLEY	1/8/19 93	8/18/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
14							
15	70	<u>7439</u> <u>8171</u>	MICHAEL'S PETS	6/3/19 93	8/16/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
16							
17							
18	71	<u>7413</u> <u>8789</u>	NEVERLAND VALLEY	2/13/1 991	8/12/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
19							
20							
21	72	<u>7413</u> <u>8793</u>	NEVERLAND VALLEY	2/13/1 991	8/12/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
22							
23							
24	73	<u>7413</u> <u>8794</u>	NEVERLAND VALLEY	2/13/1 991	8/12/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
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74	<u>7413</u> 8798		2/13/1 991	8/12/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
75	<u>7413</u> 8799	NEVERLAND VALLEY	2/13/1 991	8/12/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
76	<u>7438</u> 4029	MP [MICHAEL'S PETS]	4/29/1 993	8/9/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
77	<u>7438</u> 4031	MP [MICHAEL'S PETS]	4/29/1 993	8/9/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
78	<u>7438</u> 4046	MJ	4/29/1 993	8/9/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
79	<u>7438</u> 4047	MJ	4/29/1 993	8/9/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
80	<u>7439</u> 9326	MICHAEL'S PETS	6/7/19 93	8/9/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
81	<u>7411</u> 7952	NEVERLAND VALLEY	11/26/ 1990	8/5/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9

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82	$\frac{7413}{8782}$		2/13/1991	8/5/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
83	$\frac{7413}{8787}$		2/13/1991	8/5/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
84	$\frac{7438}{4034}$	MJ	4/29/1993	8/2/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
85	$\frac{7438}{4048}$	MJ	4/29/1993	8/2/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
86	$\frac{7438}{4042}$	MJ	4/29/1993	7/26/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
87	$\frac{7413}{8795}$		2/13/1991	7/22/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	14.9
88	$\frac{7411}{7953}$	NEVERLAND VALLEY	11/26/1990	7/15/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
89	$\frac{7413}{8780}$		2/13/1991	7/8/1994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0

1						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
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3							
4	90	<u>7413</u> <u>8800</u>	NEVERLAND VALLEY	2/13/1 991	7/8/19 94		15.0
5						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
6	91	<u>7438</u> <u>4030</u>	MP [MICHAEL'S PETS]	4/29/1 993	7/5/19 94		15.0
7							
8						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
9							
10	92	<u>7438</u> <u>4035</u>	MICHAEL'S PETS	4/29/1 993	7/5/19 94		15.0
11						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
12							
13	93	<u>7438</u> <u>4037</u>	MICHAEL'S PETS	4/29/1 993	7/5/19 94		15.0
14						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
15							
16	94	<u>7438</u> <u>4038</u>	MICHAEL'S PETS	4/29/1 993	7/5/19 94		15.0
17						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
18							
19	95	<u>7438</u> <u>4039</u>	MICHAEL'S PETS	4/29/1 993	7/5/19 94		15.0
20						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
21							
22	96	<u>7438</u> <u>4041</u>	MJ	4/29/1 993	7/5/19 94		15.0
23						DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	
24							
25	97	<u>7413</u> <u>8790</u>	NEVERLAND VALLEY	2/13/1 991	7/1/19 94		15.0

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98	<u>7438</u> <u>4032</u>	MICHAEL'S PETS	4/29/1 993	6/29/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
99	<u>7438</u> <u>4036</u>	MICHAEL'S PETS	4/29/1 993	6/29/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
100	<u>7411</u> <u>7958</u>	NEVERLAND VALLEY	11/26/ 1990	6/18/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
101	<u>7411</u> <u>7959</u>	NEVERLAND VALLEY	11/26/ 1990	6/11/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
102	<u>7413</u> <u>8791</u>	NEVERLAND VALLEY	2/13/1 991	6/11/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
103	<u>7413</u> <u>8796</u>		2/13/1 991	6/11/1 994	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.0
104	<u>7411</u> <u>7956</u>	NEVERLAND VALLEY	11/26/ 1990	6/4/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.1
105	<u>7411</u> <u>7961</u>	NEVERLAND VALLEY	11/26/ 1990	6/4/19 94	DEAD Abandoned: No Statement of Use filed after Notice of Allowance was issued.	15.1

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2						DEAD Abandoned: No	
3						Statement of Use filed	
4	106	<u>7411</u> <u>8041</u>	NEVERLAND VALLEY	11/26/ 1990	6/4/19 94	after Notice of Allow- ance was issued.	15.1
5						DEAD Abandoned: No	
6						Statement of Use filed	
7	107	<u>7413</u> <u>8785</u>	NEVERLAND VALLEY	2/13/1 991	5/27/1 994	after Notice of Allow- ance was issued.	15.1
8						DEAD Abandoned: No	
9						Statement of Use filed	
10	108	<u>7411</u> <u>7962</u>	NEVERLAND VALLEY	11/26/ 1990	5/13/1 994	after Notice of Allow- ance was issued.	15.1
11						DEAD Abandoned: No	
12						Statement of Use filed	
13	109	<u>7411</u> <u>7963</u>	NEVERLAND VALLEY	11/26/ 1990	5/13/1 994	after Notice of Allow- ance was issued.	15.1
14						DEAD Abandoned: No	
15						Statement of Use filed	
16	110	<u>7418</u> <u>6145</u>	DANGEROUS	7/18/1 991	5/5/19 94	after Notice of Allow- ance was issued.	15.2
17						DEAD Abandoned: No	
18						Statement of Use filed	
19	111	<u>7411</u> <u>7951</u>	NEVERLAND VALLEY	11/26/ 1990	4/30/1 994	after Notice of Allow- ance was issued.	15.2
20						DEAD section 8	
21	112	<u>7360</u> <u>7356</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	4/25/1 994		15.2
22						DEAD Abandoned: No	
23						Statement of Use filed	
24	113	<u>7413</u> <u>8781</u>		2/13/1 991	4/22/1 994	after Notice of Allow- ance was issued.	15.2
25						DEAD Abandoned: No	
26						Statement of Use filed	
27	114	<u>7435</u> <u>7475</u>	MJ	2/10/1 993	4/13/1 994	after Notice of Allow- ance was issued.	15.2
28	115	<u>7360</u> <u>7343</u>	MICHAEL'S PETS	7/1/19 86	3/3/19 94	DEAD section 8	15.3

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116	<u>7360</u> <u>7344</u>	MICHAEL'S PETS	7/1/19 86	3/3/19 94	DEAD section 8	15.3
117	<u>7360</u> <u>7354</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/14/1 994	DEAD section 8	15.4
118	<u>7360</u> <u>7379</u>	MP [MICHAEL'S PETS]	7/1/19 86	2/14/1 994	DEAD section 8	15.4
119	<u>7360</u> <u>7351</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
120	<u>7360</u> <u>7353</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
121	<u>7360</u> <u>7355</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
122	<u>7360</u> <u>7358</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
123	<u>7360</u> <u>7381</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
124	<u>7360</u> <u>7382</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
125	<u>7360</u> <u>7384</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
126	<u>7360</u> <u>7386</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	2/7/19 94	DEAD section 8	15.4
127	<u>7360</u> <u>7352</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	1/31/1 994	DEAD section 8	15.4
128	<u>7360</u> <u>7357</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	1/31/1 994	DEAD section 8	15.4

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129	<u>7360</u> <u>7359</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	1/31/1 994	DEAD section 8	15.4
130	<u>7360</u> <u>7387</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	1/24/1 994	DEAD section 8	15.4
131	<u>7360</u> <u>7388</u>	THE WORLD OF MICHAEL JACKSON	7/1/19 86	1/24/1 994	DEAD section 8	15.4
132	<u>7360</u> <u>7395</u>	MP [MICHAEL'S PETS]	7/1/19 86	1/18/1 994	DEAD section 8	15.4
133	<u>7360</u> <u>7365</u>	MICHAEL'S PETS	7/1/19 86	1/10/1 994	DEAD section 8	15.5
134	<u>7360</u> <u>7369</u>	MICHAEL JACKSON	7/1/19 86	1/10/1 994	DEAD section 8	15.5
135	<u>7360</u> <u>7374</u>	MICHAEL JACKSON	7/1/19 86	1/3/19 94	DEAD section 8	15.5
136	<u>7360</u> <u>7361</u>	MICHAEL'S PETS	7/1/19 86	12/27/ 1993	DEAD section 8	15.5
137	<u>7360</u> <u>7377</u>	MP [MICHAEL'S PETS]	7/1/19 86	12/27/ 1993	DEAD section 8	15.5
138	<u>7360</u> <u>7391</u>	MICHAEL JACKSON	7/1/19 86	12/27/ 1993	DEAD section 8	15.5

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139	<u>7360</u> <u>7364</u>	MICHAEL JACKSON	7/1/19 86	12/20/ 1993	DEAD section 8	15.5
140	<u>7360</u> <u>7366</u>	MICHAEL'S PETS	7/1/19 86	12/20/ 1993	DEAD section 8	15.5
141	<u>7360</u> <u>7368</u>	MICHAEL JACKSON	7/1/19 86	12/20/ 1993	DEAD section 8	15.5
142	<u>7360</u> <u>7376</u>	MP [MICHAEL'S PETS]	7/1/19 86	12/20/ 1993	DEAD section 8	15.5
143	<u>7360</u> <u>7394</u>	MICHAEL JACKSON	7/1/19 86	12/20/ 1993	DEAD section 8	15.5
144	<u>7360</u> <u>7342</u>	MICHAEL'S PETS	7/1/19 86	12/6/1 993	DEAD section 8	15.6
145	<u>7360</u> <u>7345</u>	MICHAEL'S PETS	7/1/19 86	12/6/1 993	DEAD section 8	15.6
146	<u>7360</u> <u>7363</u>	MICHAEL'S PETS	7/1/19 86	12/6/1 993	DEAD section 8	15.6
147	<u>7360</u> <u>7380</u>	MP [MICHAEL'S PETS]	7/1/19 86	12/6/1 993	DEAD section 8	15.6
148	<u>7360</u> <u>7412</u>	MJ	7/1/19 86	12/6/1 993	DEAD section 8	15.6
149	<u>7360</u> <u>7373</u>	MICHAEL JACKSON	7/1/19 86	11/29/ 1993	DEAD section 8	15.6
150	<u>7360</u> <u>7341</u>	MICHAEL'S PETS	7/1/19 86	11/22/ 1993	DEAD section 8	15.6

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3	151	<u>7360</u> <u>7346</u>	MICHAEL'S PETS	7/1/19 86	11/22/ 1993	DEAD section 8 15.6
4	152	<u>7360</u> <u>7347</u>	MICHAEL'S PETS	7/1/19 86	11/22/ 1993	DEAD section 8 15.6
5	153	<u>7360</u> <u>7372</u>	MICHAEL JACKSON	7/1/19 86	11/22/ 1993	DEAD section 8 15.6
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7	154	<u>7360</u> <u>7383</u>	MICHAEL JACKSON	7/1/19 86	11/22/ 1993	DEAD section 8 15.6
8	155	<u>7360</u> <u>7404</u>	MJ	7/1/19 86	11/22/ 1993	DEAD section 8 15.6
9			MP			
10	156	<u>7360</u> <u>7339</u>	[MICHAEL'S PETS]	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
11			MP			
12	157	<u>7360</u> <u>7348</u>	[MICHAEL'S PETS]	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
13	158	<u>7360</u> <u>7350</u>	MICHAEL'S PETS	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
14	159	<u>7360</u> <u>7367</u>	MICHAEL'S PETS	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
15	160	<u>7360</u> <u>7370</u>	MICHAEL JACKSON	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
16						
17	161	<u>7360</u> <u>7409</u>	MJ	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
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19	162	<u>7360</u> <u>7417</u>	MJ	7/1/19 86	11/15/ 1993	DEAD section 8 15.6
20			MP			
21	163	<u>7360</u> <u>7340</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
22			MP			
23	164	<u>7360</u> <u>7349</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
24	165	<u>7360</u> <u>7362</u>	MICHAEL'S PETS	7/1/19 86	11/1/1 993	DEAD section 8 15.7
25			MP			
26	166	<u>7360</u> <u>7375</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
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2			MP			
3	167	<u>7360</u> <u>7378</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
4			MP			
5	168	<u>7360</u> <u>7389</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
6			MP			
7	169	<u>7360</u> <u>7390</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
8			MP			
9	170	<u>7360</u> <u>7392</u>	[MICHAEL'S PETS]	7/1/19 86	11/1/1 993	DEAD section 8 15.7
10	171	<u>7360</u> <u>7405</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
11	172	<u>7360</u> <u>7406</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
12	173	<u>7360</u> <u>7407</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
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15	174	<u>7360</u> <u>7408</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
16	175	<u>7360</u> <u>7410</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
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19	176	<u>7360</u> <u>7411</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
20	177	<u>7360</u> <u>7413</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
21						
22	178	<u>7360</u> <u>7414</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
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24						
25	179	<u>7360</u> <u>7416</u>	MJ	7/1/19 86	11/1/1 993	DEAD section 8 15.7
26	180	<u>7360</u> <u>7415</u>	MJ	7/1/19 86	8/16/1 993	DEAD section 8 15.9
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2					DEAD Abandoned: No	16.2
3					Statement of Use filed	
4	181	<u>7413</u> <u>8797</u>	NEVERLAND VALLEY	2/13/1 991	4/8/19 93	after Notice of Allow- ance was issued.
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6						DEAD Abandoned: No
7	182	<u>7411</u> <u>7954</u>	NEVERLAND VALLEY	11/26/ 1990	4/23/1 992	Statement of Use filed after Notice of Allow- ance was issued.
8						17.2

9 70. During the eight years that followed until his firing in 2003, John
10 Branca never sought (or was otherwise unable) to reinstate any of these aban-
11 doned trademarks, during the eight years that followed until he was fired in
12 2003. Some of the “Michael Jackson” names were “expressly abandoned” (see
13 Ex.YY), as can be seen in the fifth column of the above table (rows 31-41). One
14 of the documents I obtained from the California Secretary of State shows Bran-
15 ca’s as a principle actor in Jackson’s life, his law firm listed on the statement of
16 information for MJJ Records, LLC, filed in November 3, 1997.

17 71. Later in 2010, I found out that Heal the World Foundation’s 1991
18 tax exempt status was suspended not dead, and acting as the 1991 charity’s
19 sole director, I revived the corporation and merged the 2008 charity with the
20 1991 charity, and all this with the full consent of the Board of Directors of the
21 2008 charity. However, both incorporations were authorized by Michael Jack-
22 son, because I was the only Director of the 1991 charity at the time of Mi-
23 chael’s death and they are now one and the same charity, as was always the
24 intention.

25 72. Since Jackson’s death I have had the pleasure to connect with his
26 Mr. Jackson’s parents Katherine and Joe Jackson who joined the board of the
27 charity in July, 2010 (see Ex.AAA). Michael Jackson’s children, Prince, Paris
28 and Blanket Jackson were also voted onto HTWF’s Youth Board of Advisors

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2 (YBA) and approved

3 by Katherine in July, 2010. To date Mrs. Jackson's three grandchildren, along
4 with other children on the YBA, have participated in an event for the homeless
5 and also met to discuss options concerning the future direction of the charity
6 (see Ex.CCC).

7 73. However, the charity's good name has been incessantly bashed in
8 the media and in court filings passed around Jackson fan blogs, and many in
9 the fan community have labeled me a crook, grifter and similar labels (see
10 Ex.DDD), and many have left donating to the charity because of the false
11 claims posted by the Jackson Estate executors against HTWF (see Ex.JJ). Also,
12 others who are affiliated with me have been similarly slandered, including
13 Katherine Jackson, who as an 80-plus year old lady and active in her own
14 faith, has been labeled in fan forums as greedy and exploiting her grandchil-
15 dren.

16 74. For my own part, one prominent Jackson blogger commended my
17 efforts in 2007 to secure Jackson's domains and I explained to her at the time
18 that I would not sell her a domain because they were the charity's. I also told
19 her the benefits of donating any charity-related domain names that she might
20 obtain (see Ex.FFF). In current time this blogger has disparaged my efforts
21 and intentions, showing a poor grasp of the facts surrounding this case, but
22 convincing many because of her large Michael Jackson following.

23 75. I have submitted evidence that will show the Estate's hands are not
24 clean regarding this case, and if time is sufficient in this trial, I will testify to
25 various deceitful practices employed by the Estate to try and destroy HTWF and
26 strip it of its trademarks. I will also testify to the serious charge of the Estate
27 manufacturing evidence to help them win this case, and will testify to a num-
28 ber of pieces of evidence related to the intellectual property attorneys Mark

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2 Harrison and Evan Spiegel, the music executive Todd Rubenstein, and the
3 online user Kate Collins (screen name) who is provided as an example of “con-
4 fusion” in the exhibits attached to the complaint of this lawsuit.

5 76. The permissions I received that authorized me to act with Jackson’s
6 brands, incorporate them, and secure its intellectual property. I partnered
7 with Jackson in 2003 to secure Heal the World Foundation’s domain collection
8 and Stu Backerman played a central role to ensure this happened. Mr.
9 Backerman no longer worked for Jackson by the end of 2003 (or very beginning
10 of 2004). In February 2005, I secured the permission from Jackson via Oxman
11 (see Ex.NN) to act as director in his stead and protect the charity’s trademarks
12 and domains.

13 77. I communicated with Van Alexander in 2006 and onward who asked
14 me in 2008 to protect the charity’s trademarks, reincorporate HTWF and se-
15 cure its 501c3 status (as mentioned earlier in this document). Raymone Bain,
16 the CEO of the Michael Jackson company, was Van Alexander’s business
17 partner.

18 78. Van Alexander is also the Jackson rep I wrote to about developing
19 an MMO (i.e. a massively multiplayer online game, see Ex.BBB) and the Estate
20 recently paired off with a company called See Virtual Worlds to develop an
21 MMO called Planet Michael. Planet Michael is also not dissimilar in name from
22 a number of the domains I transferred to MJJ Productions in 2003:
23 PlanetMJ.net, PMJ.us and seven other similar names (see Ex.U, pg.11).

24 79. I have applied for over 40 trademarks beginning February 2008, re-
25 lating to Jackson and his charity. I have also applied for over 340 international
26 marks (see Ex.OO) and have, to the degree my resources have permitted given
27 this costly law suit and the associated fifteen or so (see Ex.VV) USPTO opposi-
28 tion the Jackson Estate has against HTWF, vigilantly opposed various others

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2 who have sought to hijack the charity's intellectual property (see Ex.ZZ). I am
3 a volunteer and have, along with other volunteer staff, never received a penny
4 from the charity in compensation for my extensive and ongoing efforts for the
5 last 17 years (or nine if you only count the work I did alongside or with the au-
6 thority of Jackson and his reps). I applied to get copyrights for HTWF initia-
7 tives and the revival of the charity in 2002 (see Ex.GGG). As mentioned earlier,
8 in 2002 I also applied to protect the initials HTWF as a service mark in the
9 state of California.

10 80. I have been the owner and director of many HTWF websites that
11 have been online since 2001, using Mr. Jackson's name, image and likeness, I
12 have done so with the knowledge and consent of Mr. Jackson.

13 81. In conclusion, I preside over and protect HTWF because Jackson
14 asked me to do so and because I understand the charity's capacity to do much
15 good in the world given Jackson's own propensity to think big and make a real
16 difference in the lives of those in need, particularly the most vulnerable.

17 82. I have never been paid or received a dime for my work on behalf of
18 Michael Jackson and the HTWF.

19 83. I have never created an entity in opposition or separate and apart
20 from Michael's original HTWF.

21 84. I have at all times operated with the charitable intent to follow Mi-
22 chael Jackson's original Charity and its goals.

23 85. I have joined together Michael's original Charity and a subsequent
24 HTWF charity which are one in the same, have always been one in the same,
25 and are now legally one and the same.

26 86. I have accomplished this goal with the consent and coop of memb
27 of m family including his mother K and the support of his three young children.
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2 87. Every penny donated to Michael's Charity has been used to capture
3 domain names on Michael's behalf, register trademarks on behalf of Michael
4 Jackson, and for the sole purpose of following Michael's directives and wishes
5 expressed to me during his life.

6 88. During the last five years of Michael's life, when I was working on
7 his charity, I did not receive a single cease and desist letter nor was I given any
8 direct to stop. On the contrary I was encouraged to continue as the sole direc-
9 tor and President of HTWF, all with Michael's ratification, consent and permis-
10 sion.

11 89. It was not until Michael died that I suddenly received a cease and
12 desist letter and a demand that I turn over all the intellectual properties to Mi-
13 chael's Estate. These intellectual properties were already Michael's property.

14 90. Based on the express statements to me by Michael's attorneys and
15 messages conveyed from the Estate to me that the Estate manages, Branca and
16 McClain, had no intention of protecting the Charity, keeping it viable, protect-
17 ing the domain names and trademarks, and simply wanted to abandon, once
18 again, Michael's Charity.

19 91. I had the consent, authority, permission, and support of Michael
20 Jackson during the last 5 years of more of his life to do exactly what I did.

21 92. Not only did I work for free and worked as a home nurse taking care
22 of elderly and needy invalids and house-bound elderly, I spent over \$127,000 of
23 my own money protecting these marks, with the lifetime intent of benefiting
24 those Michael had chosen to be his beneficiaries of his good name and celebri-
25 ty, which included the homeless, the underprivileged, the uneducated, the dis-
26 enfranchised, the grief stricken, the sick, the diseased, the war-torn, and all
27 other people in the world who were in need of Healing.

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2 93. Triumph International, Inc., the Plaintiff in this action, not only did
3 nothing to protect these marks and domains, they themselves were suspended
4 and became a dormant corporation, and did not become viable again until two
5 weeks before the filing of this lawsuit. The only reason that Triumph Interna-
6 tional was brought back into being was that, at some point in the mid 2000's
7 Michael's managers discovered that Michael had signed over these assets to
8 Triumph International. Michael was 100% sole owner of Triumph Internation-
9 al.

10 94. Michael, as the owner of his name and likeness, his right of publici-
11 ty, and all of his intellectual properties, was the sole authority to give me a life-
12 time supervisory role as the Director of his revived HTWF.

13 95. I worked tirelessly for 20 years to work my way from being an out-
14 sider with no connection to Michael Jackson to becoming a friend to Michael, a
15 colleague of Michael's attorney, Brian Oxman, Raymone Bain and other of his
16 managers and agents. In addition I have become a co-director of HTWF with
17 Michael's parents, Joe Jackson, Katherine, and others.

18 96. The Estate claims that I am not connected in any way with the
19 Jackson family, Jackson management, a contractual partner in writing of Mi-
20 chael Jackson himself, is an abject lie. Even Spiegel and John Branca have
21 known for years that I played a significant role in perpetuating Michael's chari-
22 ty, and had full permission of M and his agents to do every act in regarding
23 HTWF that I have done in the last 10 years. Michael Jackson directed me to do
24 every act I have performed on behalf of his Charity.

25 97. This Court, when comparing the testimony in this trial, compared to
26 the intentionally misdirected declarations of Evan Spiegel in support of the pre-
27 liminary injunction, will see that the Estate Administrators intentionally misled
28 this Court in claiming that I have no authority.

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2 98. I have presented, in discovery in this action, over 35,000 pages of
3 documents demonstrating a direct relationship, and over 1500 documents
4 demonstrating a direct connection between myself, Michael Jackson, and Mi-
5 chael's company, known as MJJ Productions, Michael's management team,
6 and Michael's Army.

7 99. At all times, I operated pursuant to an agreement between Michael
8 Jackson and myself. I do not have a license of any kind to use Michael's name
9 and likeness or to do any of the acts I have been alleged to have committed be-
10 cause I am not a separate entity from Michael Jackson. I am perpetuating Mi-
11 chael Jackson's own proprietary interests. One does not grant a license to
12 himself. The Estate claims that I am in some kind of licensee position with Mi-
13 chael Jackson, which is directly contradictory to their original contentions that
14 I have had no relationship to Michael Jackson.

15 100. I was given the right to use Michael's name and likeness, and utilize
16 his right of publicity, in connection with two elements of HTWF: First, the right
17 to use his name in connection with charity fundraising by donations; and Two,
18 the right to use Michael Jackson's name and likeness in connection with the
19 sale of merchandize and to effectuate and promote each and every initiative I
20 created for this purpose.

21 101. I have produced in this case twelve (12) volumes of initiatives and
22 work previously shown to Michael Jackson which is superior to any efforts by
23 Michael's intellectual property attorneys, any prior directors of HTWF, or in
24 fact, anyone at all.

25 102. Every person and family member who has seen my work has been
26 thoroughly impressed and each family member who is aware of what I have
27 been doing with Michael's permission on his behalf have joined forces with me
28 to protect Michael's goals and intent to allow HTWF to survive and proceed,

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under the umbrella of Michael Jackson's name and likeness, for the benefit of the Estate and its beneficiaries.

103. I have relied upon the statements of Michael Jackson and his attorney, Brian Oxman, and his management team, headed by Raymone Bain, to work tirelessly for the past right (8) years in Michael's interests.

Dated: April 12th, 2011



By: _____
Melissa Johnson