

**Law Office of Ronald Millet, Esq.**  
**76 Oak Neck Lane**  
**West Islip, NY 11795**  
**Phone: [REDACTED] Email: ronmillet@gmail.com**

**VIA EMAIL**

May 16, 2014

Zazzle Com/AKA Zazzle Inc.  
1800 Seaport Blvd.  
Redwood, CA 94063-5543  
Attn: President/Chief Executive Officer

Re: PI Trademark

To Whom It May Concern:

We represent Paul Ingrisano ("Ingrisano") in connection with his intellectual property matters. It has been brought to our client's attention that your business, Zazzle Com/AKA Zazzle Inc., has been using the mathematical symbol "pi," referred to herein as the "PI trademark," in association with the marketing or sale of your products or of products offered through your services. We have evidence of your unlawful products to preserve as evidence. Accordingly, you are hereby directed to **CEASE AND DESIST ALL COPYRIGHT INFRINGEMENT.**

PI is a registered trademark (U.S. Reg. No. 4473631) of our client's business, Paul Ingrisano/PI Productions Corp., and is used in conjunction with goods under International Class 25. Ingrisano's use of the mark in commerce dates from 2010 and his federal registration has been in full effect since January 28, 2014. A copy of the federal trademark registration is attached for your reference as Exhibit A.

Ingrisano's federal registration of this trademark provides him with certain proprietary rights. This includes the right to restrict the use of the trademark, or a confusingly similar trademark, in association with confusingly similar products or services. The Lanham Act (the U.S. Trademark Act) also provides numerous remedies for trademark infringement and dilution, including, but not limited to, preliminary and permanent injunctive relief, money damages, a defendant's profits, provisions for the destruction or confiscation of infringing products and promotional materials, and where intentional infringement is shown (as would be the case here), attorneys' fees and possible treble money damages.

It is important that Ingrisano exercise his right to protect his trademark. It serves as an important and distinctive representation of the origin of his products as well as the goodwill of his company.

State and federal law supports our position that confusingly similar trademarks may cause confusion among customers. This confusion may cause substantial harm to the trademark by facilitating the loss of its effectiveness in establishing a distinct association between it and Ingrisano's products and services, as well as his company's goodwill.

We hereby demand on behalf of our client that you:

- immediately cease and desist your unlawful use of the PI trademark or any confusingly similar trademark in association with the sale, marketing, distribution, promotion or other identification of your products or products offered through your services and that you further provide verification in writing within ten days of the date of this letter that such activity has ceased;
- provide us, within fourteen days of the date of this letter, with an accounting for all sales of any products containing the PI trademark;
- provide, within fourteen days of the date of this letter, a written inventory showing the count and location of any products containing the PI trademark;
- disclose, within fourteen days of the date of this letter, any other uses, electronic or print, you have made of the PI trademark (and if there have been none, provide a written certification to that effect);
- provide, within fourteen days of the date of this letter, (i) an accounting of the date the PI trademark was first incorporated in your products or products offered through your services, (ii) a list of any known links to the Web page on which your products or products offered through your services using the PI trademark appears and (iii) a list of third-parties who offered such products through your services; and
- agree to cooperate in an independent audit of your books and records for the period in question (destruction of relevant evidence is a separately punishable offense).

After receipt and review of the requested information we will contact you to discuss a settlement in this matter.


If you do not comply with this cease and desist demand within this time period, Ingrisano is entitled to use your failure to comply as evidence of “willful infringement” and seek monetary damages and equitable relief for your copyright infringement. In the event you fail to meet this demand, please be advised that Ingrisano has asked us to communicate to you that he will contemplate pursuing all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney’s fees. Your liability and exposure under such legal action could be considerable.

We ask that you acknowledge receipt of this letter promptly and that you ask your counsel to contact us within ten days of its date so that we may be apprised of your intentions and avoid an unnecessary escalation and legal remedies as provided by state law and under federal law pursuant to the Lanham Act.

This letter is sent without prejudice to Ingrisano's rights and claims, all of which are expressly reserved. In addition to this certified mail, return receipt requested version of this letter we are also sending you a copy of this letter by regular first class mail in case you refuse to accept the certified mail version this letter.

If you or your attorneys have any questions, please contact me directly.

Sincerely,



Ronald Millet

Cc: Paul Ingrisano

Exhibit A

United States of America  
United States Patent and Trademark Office

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**Reg. No. 4,473,631**

**Registered Jan. 28, 2014**

**Int. Cl.: 25**

**TRADEMARK**

**PRINCIPAL REGISTER**

PAUL INGRISANO (UNITED STATES INDIVIDUAL), AKA PI PRODUCTIONS CORP  
1933 73RD STREET  
BROOKLYN, NY 11204

FOR: ATHLETIC APPAREL, NAMELY, SHIRTS, PANTS, JACKETS, FOOTWEAR, HATS  
AND CAPS, ATHLETIC UNIFORMS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 6-22-2009; IN COMMERCE 6-22-2010.

THE MARK CONSISTS OF THE PI MATHEMATICAL SYMBOL FOLLOWED BY A PERIOD.

SER. NO. 85-785,006, FILED 11-21-2012.

JILL PRATER, EXAMINING ATTORNEY



*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office