



SENT VIA EXPRESS MAIL & EMAIL [REDACTED]

July 24, 2020

Amy Keating
Mozilla Corporation
331 E. Evelyn Ave,
Mountain View, CA 94041

LEGAL NOTICE: Improper Use of LeanData's LEANDATA Mark

Dear Ms. Keating,

We represent LeanData, Inc. ("LeanData") in intellectual property matters. We are writing because we noticed that you are using LeanData's trademark LEANDATA other than as a brand name and without acknowledging that LeanData is the owner of the mark. As set forth in more detail below, we ask that you correct this either by (1) removing the webpage identified in this letter, or (2) correcting the content on the webpage to acknowledge that LEANDATA is a trademark owned by LEANDATA and that your website is not referring to the company LeanData.

Founded in 2012, LeanData is the first and leading provider of a revenue operations platform for accelerating revenue and growth in the business-to-business market. Generally speaking, the LeanData platform helps revenue teams close more deals and drive more revenues. LeanData's successful offering serves almost 600 customers, including in the fields of telecommunications (AT&T, T-Mobile, Verizon), software (Adobe, Autodesk, IBM, LinkedIn, Siemens PLM Software, SAP Concur, VMware), Business Communications Services (8x8, Cisco, RingCentral, TalkDesk, Vonage), and security (Palo Alto Networks, CrowdStrike, Gigamon, F5 Networks, Malwarebytes).

LeanData has received numerous industry awards and recognition. That includes being recognized as the Marketing Tech Company of the Year in the category of Analytics/Data Platform, a "Leading Vendor" in Lead-to-Account Matching & Routing, and a top 100 CRM company in customer services, marketing, and sales. It has received extensive media coverage in publications such as *Forbes* and industry publications like *Direct Marketing News*, *Demand Gen Report*, *MarTech Advisor*, *TMCnet.com*, *AIThority*, *Salestechstar*, *MediaPost*, *Content Management Software*, and *Inc.com*. It has also gained fame through its annual OpsStars event, the largest gathering of sales and marketing operations professionals in the world.

LeanData has been using the LEANDATA trademark (the "LEANDATA Mark") in connection with its revenue operations platform since 2012, has spent a substantial amount of time, money and resources to promote, advertise and protect the LEANDATA Mark, and has developed extremely valuable goodwill in its LEANDATA Mark. LeanData also owns a federal trademark



registration and pending application for its LEANDATA & Design Mark. *See* U.S. Reg. No. 4447403. Attached hereto is a registration certificate for this mark.

It recently came to our attention that you are using LEANDATA other than as a brand name and without acknowledging that LeanData is the owner of the mark. Specifically, the following URL contains improper use of the LEANDATA mark: [<https://www.mozilla.org/en-US/about/policy/lean-data/>]

Your use of “lean data” in this manner is detrimental to LeanData’s rights. As the owner of the LEANDATA Mark, LeanData owes it to its customers and to its investment in its brand to preserve the value of its brand. We trust you can appreciate that you would not want others using your own intellectual property improperly.

Accordingly, we request that you correct your improper usage of the LEANDATA Mark. There are two options to accomplish this:

1. Take down the page that has the improper use of the LEANDATA Mark.
2. Correct the webpage so that you:
 - a. clarify that you are not using “lean data” to refer to the company LeanData, which you recognize is the source of revenue operations platform services; and
 - b. acknowledge that the LEANDATA Mark is a trademark owned by LeanData and include a registered trademark symbol (®) where possible;

Please confirm within ten (10) days of your receipt of this letter that you will comply with our request. We appreciate your cooperation and your attention to this matter. Please do not hesitate to contact me at (415) 885-9800 or [REDACTED] if you would like to discuss any of the issues raised in this letter.

Nothing contained in this letter, nor any act or omission by LeanData, is intended or should be deemed to be a waiver or reduction of any rights, claims, defenses, or remedies that LeanData may have in regard to this matter and all such rights, claims, defenses, and remedies are hereby expressly reserved.

Sincerely,

/s/Scott Lonardo

Enclosure

United States of America

United States Patent and Trademark Office



Reg. No. 4,447,403

LeanData, Inc. (DELAWARE CORPORATION)
1175 Sonora Court
Sunnyvale, CALIFORNIA 94086

Registered Dec. 10, 2013

Corrected Aug. 13, 2019

CLASS 42: Software as a service (SAAS) featuring software for the collection, editing, and merging of enterprise data

Int. Cl.: 42

FIRST USE 4-20-2013; IN COMMERCE 4-20-2013

Service Mark

The color(s) green and aqua is/are claimed as a feature of the mark.

Principal Register

The mark consists of the words "LeanData" in stylized font, where the word "Lean" is in green font, the word "Data" is in aqua font, and the letters "L" and "D" are both capitalized. Preceding the word mark are the stylized and overlapping letters "LD" in aqua and green font and a green check mark, which design is depicted to look like a checkbox representing satisfactory certification by the company.

SER. NO. 85-911,519, FILED 04-22-2013



A handwritten signature in cursive script, appearing to read 'Andrei Iancu'.

Director of the United States
Patent and Trademark Office