

2. I am currently the Vice President of Merchandising and Licensing for The National Football Museum, Inc. dba as The Pro Football Hall of Fame, The Professional Football Hall of Fame and Professional Football's Hall of Fame ("Pro Football Hall of Fame"), and have held that position for about the past 2-1/2 years.

3. The Pro Football Hall of Fame is a corporation organized and existing under the laws of the State of Ohio and has a principal place of business located at 2121 George Halas Drive in Canton, Ohio.

4. The Pro Football Hall of Fame provides goods which include video games and video media; jewelry and collectible coins; books, magazines, posters, cards and stickers; collectibles, namely, helmets, pins, magnets, pens and pencils; glassware; clothing, namely, shorts, socks, ties, caps, and shirts, including t-shirts, polo shirts, dress shirts, sweatshirts and jerseys; and footballs, toys and games. Applicant provides educational and entertainment services in the form of a memorial exhibition and museum relating to professional football and its history and in the form of professional football games, exhibitions and television shows that are sold/provided to customers located in Ohio and throughout the United States.

5. The Pro Football Hall of Fame engages in substantial advertising and promotion of the listed goods and services, including web-based advertising, as well as advertising and promotion in other forms of media.

6. In the advertising and promotion of the goods and services, the Pro Football Hall of Fame adopted and is using, and has used continuously since at least as early as September 1, 1996, the distinctive "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" as one of its trademarks/service marks.

7. The Pro Football Hall of Fame's use of its "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" mark in the substantial advertising and promotion distinguishes its goods and services from those of others, and identifies itself among the relevant trade and public as the source of origin for its goods and services.

8. The Pro Football Hall of Fame's "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" and the goodwill associated therewith are valuable assets of and belong exclusively to the Pro Football Hall of Fame.

9. As a result of the Pro Football Hall of Fame's continuous use of the mark, it will apply for federal registration of the mark "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design."

10. RV/MH Heritage Foundation, Inc. (RV/MH Foundation) has a principal place of business at 21565 Executive Parkway in Elkhart, Indiana.

11. RV/MH Foundation provides services to recreational vehicle/motor home dealers which include, but are not limited to, open houses.

12. On or about August 11, 2010, I became aware that RV/MH Foundation had begun use of a similar design portion of the "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" on the internet web site www.kick-off-to-profits.com (Kick-off Site).

13. RV/MH Foundation's use of a similar design portion of the "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" is shown by Exhibit A attached hereto. Exhibit A is a true and accurate copy of a screen shot or screen capture of the web site displaying the similar design portion of the "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design".

14. Pro Football Hall of Fame did not and has never given permission for the use of the design portion of the "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" or any variation thereof to RV/MH Foundation.

15. RV/MH Foundation's use of a similar design portion of the "PRO FOOTBALL HALL OF FAME, CANTON, OHIO and Design" will cause the possibility of loss of substantial rights by Pro Football Hall of Fame.

Further deponent sayeth naught.

Date: 5/9/11

Steven L. Strawbridge, Jr.
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STATE OF OHIO)
) SS
COUNTY OF STARK)

BEFORE ME, a Notary Public in and for said County and State, personally appeared Steven L. Strawbridge, Jr., who signed the foregoing AFFIDAVIT in my presence and who acknowledged the same to be his free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 9th day of May, 2011.

Tamara R. Owens
Notary Public

(SEAL)

TAMARA R. OWENS
NOTARY PUBLIC-STATE OF OHIO
MY COMMISSION ENDS DEC. 3, 2012