

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:) Trademark Examining Attorney:
A Medium Corporation) Esther Queen
)
Serial Nos.: 88/472,775, 88/472,778,) Law Office: 111
88/472,882)
) Office Action Mailing Date:
) September 8, 2019
)

**DECLARATION OF SIOBHAN O'CONNOR IN SUPPORT OF
APPLICANT A MEDIUM CORPORATION'S RESPONSE TO OFFICE ACTION**

I, Siobhan O'Connor, declare as follows:

1. I am the Vice President of Editorial for the Applicant A Medium Corporation.

I have personal knowledge of the facts stated herein and could and would competently testify thereto if called as a witness.

2. Medium provides an online website with a number of publications featuring ideas and perspectives you won't find anywhere else. Medium taps into the brains of the world's most insightful contemporary writers, thinkers and storytellers to bring fresh thinking and unique perspectives on a wide variety of topics. The topics include tech, culture, food, politics, parenting, business and life. Medium's website is subscription-based, which allows a reader access to unlimited stories with a monthly subscription fee.

3. Medium uses the ZORA trademark in connection with an online publication on the Medium platform that provides information, news and commentary in the field of current events relating to opinions, relationships, and self-care for and about women of color. The content is written by and for women of color, including not only African American women, but also other women of color. Current articles include:

The Coronavirus Outbreak Is Not an Excuse to Be Racist

Why I Abandoned the American Dream and Followed My Puerto Rican Dream Instead

Your Weekly ZORAscope

ZORA Explains: Super Tuesday

Lena Waithe's 'Twenties' Signals LGBTQ + Progress at BET and Beyond

'Crazy Rich Asians' Will Not Liberate Us

Overpolicing Poses a Serious Threat to Women and Girls of Color

How to Keep Your Relationship Hot and Be a Doting Parent

The Complicated Colorism of Latina Actresses in Film

4. Medium's publications are only provided online. Medium does not provide printed publications. Medium does not publish printed newsletters, informational brochures, programs or books.

5. Attached hereto as Exhibit A is a screenshot from Medium's website membership page downloaded from <https://medium.com/membership> on March 4, 2020.

6. Attached hereto as Exhibit B is a screenshot from Medium's website featuring the ZORA publication downloaded from <https://zora.medium.com/> on March 4, 2020.

The undersigned being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or document or any registration resulting therefrom, declares that all statements made of their own knowledge are true and that all statements made on information and belief are believed to be true.

Dated: March 8, 2020


Siobhan O'Connor (Mar 8, 2020)

Siobhan O'Connor

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Your favorite writers, thinkers, and experts are publishing their best work on Medium. And you'll get access to all of it as a member. Here's a sample of the diverse, bold thinking you can expect:

OneZero
The front lines of the future.

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The Elemental Guide to Vitamins
The latest science behind the 10 most popular, plus answers to...

Markham Heid
1 min read

LEVEL
HIGHER LEARNING.

A Medium publication for black and brown men

Want a data science job? Use the weekend project principle to get it

Daniel Bourke
1 min read

Marker
MAKING YOU SMARTER ABOUT THE WORLD OF BUSINESS.

A Medium publication about the way business impacts our world.

Will Oremus
Senior writer for OneZero covering platforms, algorithms, privacy, and online speech.



How to Talk to People Who've Been Through Some S#@t
Easy on the advice

Drew Magary
1 min read

elemental+
Your life, sourced by science.

A Medium publication about health and wellness.

Morgan Jerkins
Author of the New York Times bestselling essay collection, "This Will Be My Undoing" and Senior Editor at ZORA.

Human Parts
What it means to be.

Medium's home for personal stories and perspectives.

How To Learn Any New Programming Language Quickly

Bob Roebbling
1 min read

Jessica Valenti
Feminist writer, author of New York Times bestselling book, "Sex Object: A Memoir" and columnist at GEN.



What Medium members are saying



I think writers should work for readers instead of advertisers, so I'm voting with my credit card. I happily pay for products I love. Writing is no exception.

Andrew Courter



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The Hidden White Privilege of 'Adulting'

Some of us didn't have the luxury of choosing to learn life skills

Vena Moore
Jan 10 • 6 min read

Lena Waithe's 'Twenties' Signals LGBTQ+ Progress at BET and Beyond

The new show will be the first on the network to be led by a queer person

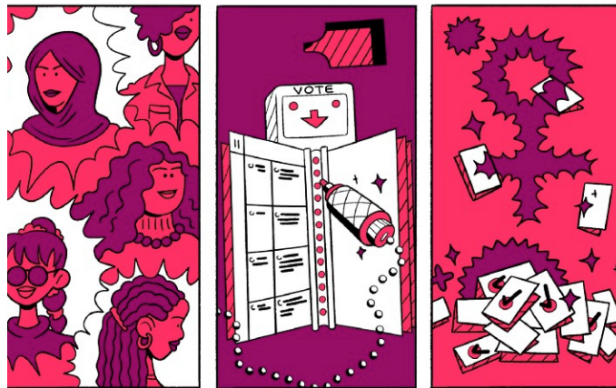
Tr'vell Anderson
Mar 4 • 9 min read



These Formerly Incarcerated Women Fought to Close a Jail and Won

The Atlanta City Detention Center was for those with small violations, but the effect on their lives was tremendous

Victoria Law
Mar 4 • 8 min read



ZORA Explains: Super Tuesday

Super Tuesday [\ `sū-pər| \ `tūz-(.)dā] An election day in the U.S. when the most states hold primary elections and caucuses

Prachi Gupta
Mar 3 • 2 min read

America doesn't hold a national primary election day to pick the presidential nominee for a political party. Instead, we have Super Tuesday

— the largest set of primary elections and caucuses across the nation, during which more than a dozen states and territories hold contests for presidential candidates.

The results of Super Tuesday are often a predictor of who may win a party's nomination and go on to be on the ballot during the presidential race come November.

People of color play an increasingly influential role on Super Tuesday. In 2020, the 14 states and one territory that will hold contests are more racially diverse than all of the states that hold primaries and caucuses afterward. Because primary season kicks off in two of the whitest states in the country — New Hampshire and Iowa — Super Tuesday is a way to gauge how candidates will fare in a more racially diverse contest and also gives voters of color a say in which candidates move forward in the process.

Ironically, Super Tuesday began in the 1980s as a way to quell the rising influence of voters of color. In 1988, a group of white Southern Democrats united to hold elections early in primary season, reasoning that they could build more momentum around their favored, moderate candidate. The plan backfired that year with Black voters turning out to the polls to support Jesse Jackson in droves — but Super Tuesday stuck.

Women of color represent a growing and powerful political force, with Black women having the highest voter turnout among them. Super Tuesday is a chance for women of color to continue to raise their voices and push forward the candidates who prioritize their needs.



How Do You Solve a Problem Like Mike Bloomberg?

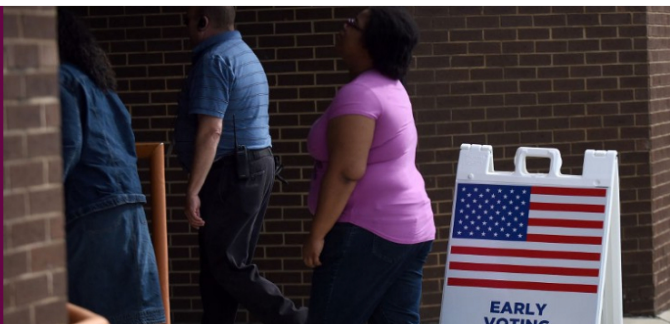
The former New York City Mayor is superrich, and though he has racist policies, he still might be our best bet

Danielle Moodie-Mills
Mar 3 • 5 min read

2020 Democratic Primary: Who Should I Vote for On Super Tuesday

Melissa Harris-Perry talks with top ranking Black women in the 2020 presidential campaigns before casting her Super Tuesday vote

Melissa Harris-Perry
Mar 2 • 10 min read



Your Weekly ZORAscope

March 2—March 8, 2020

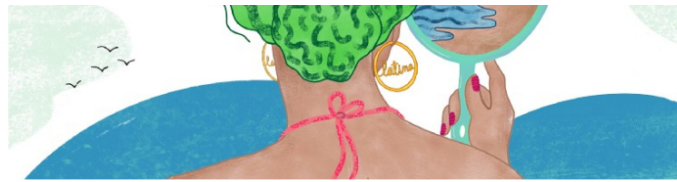
Ashleigh D. Jay
Mar 2 • 11 min read

Why I Abandoned the American Dream and Followed My Puerto Rican Dream Instead



I came back home to show my native homeland the love it deserves

Melissa Alvarado Sierra
Feb 18 • 9 min read



XOXO

How to Keep Your Relationship Hot and Be a Doting Parent

Preserve your sexy time with these practical tips

Feminista Jones
Mar 2 • 5 min read

Overpolicing Poses a Serious Threat to Women and Girls of Color

The arrests of Kaia Rolle, 6, and grieving mother Nyisha Beemon, shine a light on a blindspot in national empathy

Adrienne Samuels Gibbs
Feb 28 • 6 min read



A Warning to Georgia Voters To Ensure Their Votes Count

Despite major concerns, Georgians are set to vote on a new controversial electronic election system

Anjali Enjeti
Feb 28 • 4 min read

“Framing Latinx representation according to essentialist notions of Latinidad (the idea that any Latinx representation is a win for all Latinx people) is as insufficient now as it was then.”

— Mariana Viera

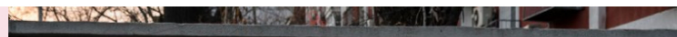
The Complicated Colorism of Latina Actresses in Film
Feb 28 • 7 min read



When Plus-Sized Black Women in Music Were Invisible

Before women like Lizzo and Brittany Howard were getting their shine, Martha Wash and others before them struggled to be properly credited

J'na Jefferson
Feb 27 • 5 min read



The Coronavirus Outbreak Is Not an Excuse to Be Racist

Racism and xenophobia are scarier than any disease

Li Charmaine Anne
Feb 27 • 5 min read



Survivors of Color Need More Than a Guilty Harvey Weinstein Verdict

Perhaps now more of our sexual assault complaints will be taken seriously

Danielle Campoamor
Feb 26 • 5 min read

Olympic Icon Flo Jo Raced to the Top and Took Us With Her

Beyond the nails, one-legged tracksuits, and world records, Florence Griffith Joyner set the stage for women to build million-dollar brands

Amira Rose Davis
Feb 26 • 10 min read



What Our Immigrant Mothers Don't Discuss About Mental Health

I thought my mother and I were different, but our lives could not have been more in sync

Nisa Dang
Feb 26 • 6 min read

Self-Care Tips For Women Who Aren't White

Limited income, stressful jobs, and daily traumas mean Black and Brown women need a more intense, less expensive pamper routine

Melissa Kimble
Feb 25 • 5 min read

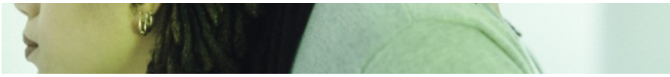


XOXO

7 Deadly Relationship Sins to Avoid at All Costs

These behaviors can ruin an otherwise healthy partnership

Feminista Jones
Feb 25 • 5 min read



FEB 25 • 6 min read



'Crazy Rich Asians' Will Not Liberate Us

Delusions of Whiteness drove this author to reject the 'model minority' stereotype

Taylor Moore
Feb 25 • 7 min read



"The women who begged her for abortions, and there were many who came to Brown, often called Dr. D or "The Lady Who Cuts.""

— Dr. Cynthia R. Greenlee

This Abortion Rights Advocate Fought for Women of Color When No One Else Would
Feb 24 • 8 min read



Let's Get Real About Why Women of Color Are So Tired

Playing by the rules in capitalist America comes at the cost of our mental, physical, and emotional health

Sayu Bhojwani
Feb 11 • 6 min read

Lane Kim of 'Gilmore Girls' Defied First-Generation Expectations

She may have been Rory's best friend, but she was more than that to Asian American audiences

Naureen Khan
Feb 21 • 6 min read



'I Can Be a Therapist and... Do Porn'

Meet Jet Setting Jasmine, who is rejecting cultural norms through her work in therapy and adult films

Starrene Rhett Rocque
Feb 20 • 8 min read

"If I want to be happy with the whole of me, I must accept each part of me, including my hair."

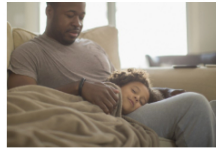
— Sylene "SylJoe" Joseph

I Don't Always Love My Kinky, Coily Hair, but I'm Trying

How to Cure Childhood Anxiety, One Sam Cooke Album at a Time

When Dad routinely came home after midnight, only music soothed my childhood soul

Bassey Ikpi
Feb 19 • 5 min read



Just Where Is the Asian American Woman's Vote?

Their participation could make a difference, but their eligibility and rights have had a challenging start

Hahna Yoon
Feb 18 • 6 min read



Climate Change Isn't the First Existential Threat

People of color know about building movements, about courage, about survival

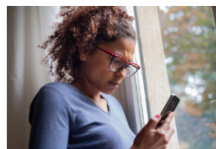
Mary Annaise Heglar
Feb 18, 2019 • 5 min read



How To Deal With Jealousy When It Threatens Your Relationship

Hint: The answer is to rely heavily on trust

Feminista Jones
Feb 17 • 4 min read



I Told My 4-Year-Old the Truth About Slavery

Our ancestors lived it so our children can learn it

Kiana Keys
Feb 17 • 6 min read



Black People Should Start Taking Racists to Court

It might be the only way we get the justice we deserve

Marley K.
Jan 22 • 8 min read



'The Photograph's Stella Meghie Is Hollywood's Black Romance Savior

The writer-director of 'The Photograph' is unapologetic about telling Black love stories

Tre'vell Anderson
Feb 14 • 5 min read



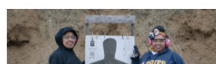
Lana Condor and the Adoptee's Place in Asian American Storytelling

'To All the Boys I Loved Before' may be a love story, but it also is a much-needed representation of transracial Asian adoptees, too

Andrea Ruggirello
Feb 14 • 6 min read



Afraid of Being a Target, These Black Women Just Graduated From Handgun



Training

These women say the debate over gun control versus ownership is, well, complicated

Tina Vasquez
Feb 13 • 10 min read



When Tyra Banks Confronted Naomi Campbell On National Television

It was a clash of memories, but overall, the rivalry was awkwardly one-sided

Sarah Hagi
Feb 13 • 5 min read



After a Double Mastectomy, Maya Rockey Moore Cummings Is Not Giving Up

The congressional candidate speaks out on her preventative measure and breast cancer among Black women

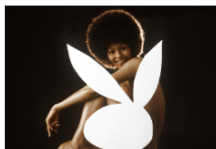
Erika Stallings
Feb 12 • 6 min read



What Happened to Playboy's First Black Cover Girl?

She was destined to become a supermodel but bad timing and a series of misfortunes thwarted what could have been

Morgan Jerkins
Feb 10 • 12 min read



Why The Friends vs. Living Single Twitter Beef Really Matters

Erika Alexander, a star of the beloved sitcom, on the systemic ignorance behind the battle

Erika Alexander
Feb 10 • 7 min read



It Took Me 18 Years to Embrace My Name

I used to allow people—even my brother—to mispronounce my name. I finally put a stop to it.

Fiza Pirani
Feb 10 • 7 min read



Stacey Abrams' Bold Ambition Will Encourage Other BIWOC to Run for Office

WOC candidates may be seen as unlikable, unviable, and not electable but Abrams' grit is changing that

Anjali Enjeti
Feb 10 • 4 min read



The New Russell Simmons Doc Asks: Who Will Stand With Black Women?

It's more important than ever to stand by Black women and believe their stories

Shanita Hubbard
Feb 7 • 8 min read



20 Relationship Lessons I Learned From Jill Scott's Debut Album

Before the Neo-Soul singer's anniversary tour kicks off, I reflect on this classic from 20 years ago

Feminista Jones
Feb 6 • 7 min read



Searching for Healing in a Sensory Deprivation Tank

When being Black and surviving in this world became too much, I sought to become nothing

Daniele Dickerson
Feb 5 • 7 min read



Letting Black Girls Be Weak and Warriors at the Same Time

Black women have not had permission to be both. We need to be seen for all of who we are.

Khristi Lauren Adams
Feb 4 • 6 min read



The Novel 'Black Sunday' Bravely Takes on Parental Abandonment

In a ZORA exclusive with the author, we explore power, sex, and religion against the backdrop of Lagos

Nneka M. Okona
Feb 4 • 8 min read



Here's the Real State of Our Union, as WOC See It

In this ZORA first, a roundtable of key women of color express shaky optimism, as well as willingness to harness the power that lies within

Melissa Harris-Perry
Feb 3 • 12 min read



Black History Month Alert: Madam C.J. Walker Gets a New Celebratory Exhibition

She was not only a millionaire but also a philanthropist and political activist

Amber Gibson
Feb 3 • 6 min read



Whoever Said Surfing Is for White People Never Met These Women

A growing number of Black and Brown enthusiasts are joining the scene

yolanda evans
Jan 28 • 6 min read



What No One Tells Black Women About Fibroids

Our tumors are usually larger and we're more likely to be hospitalized. This is a crisis.

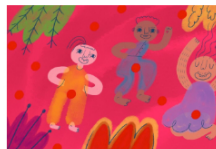
Evette Dionne
Jan 31 • 7 min read



Meet the Latina Fighting Chicago's Period Poverty

Sanitary products are not a luxury, but a human right

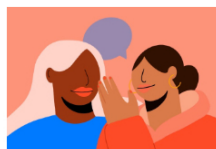
Lola Méndez
Jan 30 • 7 min read



How to Get the Mind- and Back-Blowing Sex You Desire

It begins with not settling for the mediocre

Feminista Jones
Jan 27 • 6 min read



I Have A 'Starbucks Name.' Do You?

Among the Sarahs and Melanies, I was the oddity. So I decided to use a fake name.

Hurriya Burney
Jan 4 • 5 min read



When Black Women Go From Office Pet to Office Threat

First your boss loves you, then they dislike you. Here's how Black women can manage the icy transition.

Erika Stallings
Jan 16 • 9 min read



Meghan Markle Defeated the British Monarchy

The Sussexes' refusal to submit to tradition was a long time coming, and it will shake up the Royal Family

Morgan Jerkins
Jan 9 • 4 min read



How the Movie 'Parasite' Confronts Native Stereotypes

Although director Bong Joon-ho wants to expose naivete toward Native American history, the representation is unevenly handled

Shea Vassar
Jan 13 • 6 min read



The Major Built-In Bias of the Publishing World

A look at how Black women are faring

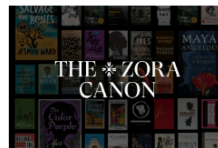
Jennifer Baker
Jan 8 • 14 min read



The ZORA Canon: 100 Best Books by African American Women Authors

Celebrating more than 150 years of African American literature with 100 books written by African American women

ZORA Editors
Jan 7 • 23 min read



The ZORA Canon

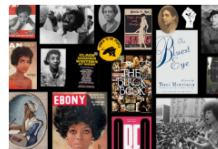
The 100 greatest books ever written by African American women

ZORA Editors
Jan 6 • 1 min read

It's Time to Name the African American Women's Canon

We have been building and archiving our narratives, and this list of 100 picks gives flowers to our voices

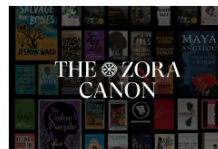
Kaitlyn Greenidge
Jan 7 • 8 min read



The ZORA Canon

The 100 greatest books ever written by African American women

ZORA Editors
Jan 6 • 23 min read



10 Black Women Writers You Should Read Right Now

These next-generation literary lights deserve to be on your radar

ZORA Editors
Jan 7 • 3 min read



ZORA's Weekend Roundup

Everything we want to see, do, discover and listen to during our downtime

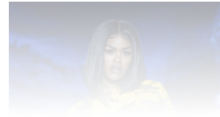
ZORA Editors
Feb 28 • 2 min read



ZORA's Weekend Roundup

Everything on our to-do, see, scout out, and listen to list

ZORA Editors



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