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12 SYMPLE LENDING, LLC

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ERIC J. TROUTMAN and
16 TROUTMAN AMIN, LLP;

17 Plaintiffs,

18 v.

19 SYMPLE LENDING LLC,

20 Defendant.

Case No.: 8:25-cv-01181-JVS-KES

**DECLARATION OF SARA
ESCALANTE IN SUPPORT OF
DEFENDANT SYMPLE LENDING,
LLC’S RESPONSE AND
OPPOSITION TO ORDER TO
SHOW CAUSE RE: ENTRY OF A
PRELIMINARY INJUNCTION**

Date: June 17, 2025

Time: 9:00 a.m.

Location: Courtroom 10C, 411 W. 4th
St., Santa Ana, California

District Judge: Hon. James V. Selna
Complaint Filed: May 30, 2025

1 I, Sara Escalante, on my oath, do hereby state and declare as follows:

2 1. I am a member of the bar of the State of California, and am an
3 associate attorney with the law firm of Angelo & White, counsel for defendant
4 Symple Lending, LLC (hereinafter "Symple"). I have personal knowledge of the
5 matters in this declaration, except for those matters stated on information and
6 belief and those I believe to be true, and if required could and would testify
7 competently to them.

8 1. I make this declaration in support of Symple's Response and
9 Opposition to Court's Order to Show Cause Re: Entry of a Preliminary Injunction

10 2. The statements set forth in this declaration are based on personal
11 knowledge, except for those matters stated on information and belief, which I
12 believe to be true.

13 3. On June 6, 2025, I engaged the services of CompuMark Clarivate
14 ("CompuMark") on behalf of Angelo & White. CompuMark provides trademark
15 search and monitoring services.

16 4. I provided CompuMark with a hyperlink to Plaintiff's Claimed Mark
17 which is at issue in this litigation. I instructed CompuMark to conduct an "all
18 classes" U.S. Design search from the United States Patent and Trademark Office
19 ("USPTO"), as well as a Web Common Law Design search in relation Plaintiff's
20 Claimed Mark.

21 5. The results of the U.S. Design search from the USPTO search
22 conducted by CompuMark are attached hereto, marked as "**Exhibit D**".

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