UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAHUL MANCHANDA, *Plaintiff*, -against- GOOGLE, YAHOO, MICROSOFT BING, *Defendants*.	Index No. CV-005886-16/NY Case No._____ **NOTICE OF REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. § 1441(a)**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1338, 1441, and 1446, Defendant Yahoo! Inc. ("Yahoo"), erroneously named in the Complaint as "Yahoo," by and through its attorneys, hereby notices the removal of this case from the Civil Court of the City of New York, County of New York to the United States District Court for the Southern District of New York. In support of this Notice of Removal, Yahoo states as follows:

1. On April 4, 2016, Plaintiff, Rahul Manchanda ("Plaintiff" or "Manchanda") filed a Complaint in Civil Court of the City of New York, County of New York bearing the caption *Rahul Manchanda v. Google, Yahoo, Microsoft Bing*, Index No. CV-005886-16/NY (the "State Court Action").

2. Yahoo was served with and first received a copy of the Summons and Complaint on April 5, 2016. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Yahoo in the State Court Action are attached as **Exhibit 1**.

3. This Notice of Removal is timely under 28 U.S.C. § 1446(b)(1), including because it has been filed within thirty days of service of the Summons and Complaint.

4. Although the Summons provided that Yahoo respond within 20 days of service, Plaintiff agreed to extend the deadline for responding by an additional 21 days.

5. This Court has original jurisdiction over the Action pursuant to 28 U.S.C. §§ 1331 and 1338 because the Complaint requests relief under the Lanham Act, 15 U.S.C. § 1125 and Civil RICO Act, 18 U.S.C. § 1964.

6. Plaintiff bases virtually all of his claims on the allegedly unauthorized use of Plaintiff's putative federal trademark registrations, and insofar as any of Plaintiff's claims can somehow be construed as a proper request for relief under state law only, such claims are so related to the claims for which this Court has original jurisdiction that they form part of the same case or controversy. As such, this Court may exercise supplemental jurisdiction under 28 U.S.C. § 1367.

7. As the United States District Court embracing the place where the Action is pending in state court, this Court is appropriate for removal under 28 U.S.C. § 1441(a).

8. Counsel for Yahoo has been in contact with counsel for defendants Microsoft and Google, and although neither believes they were properly served with the complaint, they both consent to removal; therefore, removal is proper under 28 U.S.C. § 1446(b)(2).

9. This Notice of Removal will be filed and served as required by 28 U.S.C. § 1446(d). A copy of the Notice of Removal to Federal Court that will be filed in the state court is attached as **Exhibit 2**.

10. By filing this Notice of Removal, Defendant does not waive, and hereby expressly reserves, the right to assert any defense or motion available in this action after it is removed to this Court.

WHEREFORE, Yahoo prays that this action, in its entirety, be removed to the United States District Court for the Southern District of New York.

Dated May 5, 2016.

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ Jeremy A. Schachter
Jeremy A. Schachter (JS 2181)
The Grace Building
1114 Avenue of the Americas
21st Floor
New York, New York 10036
Telephone: (212) 775-8750
jschachter@kilpatricktownsend.com

Dennis Wilson (*pro hac vice* application forthcoming)
Caroline Barbee (*pro hac vice* application forthcoming)
9720 Wilshire Blvd PH
Beverly Hills, California 90212
Telephone: (310) 777-3740
dwilson@kilpatricktownsend.com
cbarbee@kilpatricktownsend.com

Attorneys for Defendant Yahoo Inc.

CERTIFICATE OF SERVICE

This is to certify that on this 5th day of May, 2016, I served a copy of the foregoing **Notice of Removal of Civil Action** upon counsel for Plaintiff by first class mail addressed as follows:

Rahul D. Manchanda, Esq.
MANCHANDA LAW OFFICE PLLC
30 Wall Street, 8th Floor
New York, New York 10005

A copy was also served via email to RDM@MANCHANDA-LAW.COM.

/s/ Jeremy A. Schachter
Jeremy A. Schachter

EXHIBIT 1

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

----------x

RAHUL MANCHANDA,

Plaintiff,

-against-

GOOGLE, YAHOO, MICROSOFT BING,

Defendants.

----------x

Index No. 2016

SUMMONS

Plaintiff's Business Address:
30 Wall Street, 8th Floor
New York, NY 10005

The basis of the venue is the Plaintiff place of business

To the Above-named Defendants:

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of New York at the office of the said court at 111 Centre Street, New York, New York, 10013, in the County of New York, within the time provided by the law as noted below and to file your answer to the annexed complaint with the Clerk; upon your failure to answer, judgment will be taken against you together with the costs of this action.

Dated: New York, New York
April 1, 2016

Manchanda Law Office PLLC
By: Rahul Manchanda, Esq.
30 Wall Street, 8th Floor
New York, New York 10005
Tel: (212) 968-8600

Yahoo
229 W 43rd St
New York NY 10036

Google
111 Eighth Ave
New York NY 10011

Microsoft Bing
11 Times Square
New York NY 10036

NOTE: The law provides that (a) if this summons is served by its delivery to you personally within the City of New York, you must appear and answer within TWENTY (20) days after such service; or

(b) if this summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed THIRTY (30) days after proof of service thereof is filed with the Clerk of the Court within which to appear and answer.

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

----------x

RAHUL MANCHANDA,

Plaintiff, **COMPLAINT**

-against-

Index No.:

GOOGLE, YAHOO, MICROSOFT BING,

Defendants.

----------x

Plaintiff, Rahul Manchanda, for its complaint against defendants, GOOGLE, YAHOO, MICROSOFT BING, alleges:

1. Plaintiff, at all times relevant hereto, was and is a lawyer located at 30 Wall Street, 8th Floor, New York NY 10005, who provides legal and real estate broker services. Defendants Yahoo, Google, Microsoft Bing are located at 701 First Avenue Sunnyvale CA 94089, 1600 Amphitheatre Parkway Mt View CA 94043, 1 Microsoft Way Redmond WA 98052 respectively.

2. Plaintiff was defamed wildly on Google wherein Google Adwords is making money off of my protected Trademarks "RAHUL MANCHANDA" (USPTO 4485094) and "MANCHANDA LAW OFFICE" (USPTO 4504612) to the tune of almost $13 per click. See the attached screenshots and official trademarks (Exhibit A).

3. This is of course, as you know, unacceptable and is a *prima*

violation of my protected marks.

4. Since Plaintiff has documentary proof that Google is not only making a ton of money using my trademarks but they are also listing my trademarks when people search for my trademarks as separate listings, thus marketing my trademarks on their own, without my input, knowledge or permission.

5. This forces me to raise my bids against Google and others for my own protected trademarks. See the attached Exhibit A.

5a. In addition to claiming likelihood of confusion, a trademark owner may claim trademark "dilution," asserting that it owns a famous mark and the use of the mark diminishes the strength or value of the trademark owner's mark by "blurring" the mark's distinctiveness or "tarnishing" the mark's image by connecting it to something distasteful or objectionable-even if there is no likelihood of confusion.

6. Plaintiff is requesting the removal or de-indexing of the links I provided to them from their Google Listings the following links which infringe my trademarks, or face a trademark infringement suit:

http://www.ripoffreport.com/r/Manchanda-Law-Offices-Rahul-Manchanda/New-York-New-York-10005/Manchanda-Law-Offices-Rahul-Manchanda-Lets-unite-and-fight-this-guy-I-already-won-a-fee-337859

http://www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manchanda-Rahul-Dev-Manchanda-Manchanda-Law-FirmRahul-Manchanda-Rahul-Manchanda-F-1065994

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-threatened-to-kill-her/

http://www.complaintsboard.com/complaints/manchanda-law-office-pll
c-new-york-new-york-c382370.html

http://usacomplaints.com/shops-trade/594091-manchanda-law-firm-rah
ul-manchanda-complaints-reviews.html

http://www.ripoffreport.com/r/Manchanda-Law/New-York-New-York-1000
5/Manchanda-Law-Offices-Worst-Immigration-and-Deportation-Attorney
-New-York-New-York-282791.

7. Similarly Plaintiff has requested that Microsoft Bing, also benefitting as above with their advertising, similarly remove or de-index the following links:

http://www.ripoffreport.com/reports/directory/rahul-manchanda

http://www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manch
anda-Rahul-Dev-Manchanda-Manchanda-Law-FirmRahul-Manchanda-Rahul-M
anchanda-F-1065994

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-
threatened-to-kill-her/

http://www.complaintsboard.com/complaints/manchanda-law-office-pll
c-new-york-new-york-c382370.html

http://www.ripoffreport.com/r/manchanda-law-offices-rahul-manchand
a/new-york-new-york-10005/manchanda-law-offices-rahul-manchanda-le
ts-unite-and-fight-this-guy-i-already-won-a-fee-337859

http://www.complaintsboard.com/complaints/manchanda-law-office-pll
c-new-york-new-york-c382370.html

http://www.scamorg.com/manchanda-law-offices-amp-associates-pllc-ed

8. Finally Plaintiff has made the same request to Yahoo to remove or de-index the following links as well:

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-
threatened-to-kill-her/

http://www.ripoffreport.com/r/Manchanda-Law-Offices-Rahul-Manchand
a/New-York-New-York-10005/Manchanda-Law-Offices-Rahul-Manchanda-Le
ts-unite-and-fight-this-guy-I-already-won-a-fee-337859

http://www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manch
anda-Rahul-Dev-Manchanda-Manchanda-Law-FirmRahul-Manchanda-Rahul-M
anchanda-F-1065994

http://www.complaintsboard.com/complaints/manchanda-law-office-pll
c-new-york-new-york-c382370.html

http://usacomplaints.com/shops-trade/594091-manchanda-law-firm-rah
ul-manchanda-complaints-reviews.html

9. Needless to say, Google, Yahoo and Microsoft Bing to show case defamatory, slanderous, and libelous links which contained multiple instances of erroneous information, poorly performed research, non-corroborated statements, defamatory portrayals of Plaintiff, reckless disregard for the truth, negligent disregard for the truth, sensationalism aimed at capitalizing on Plaintiff's quasi-celebrity status to sell newspapers and attract people to their paid print and online advertisements, violations of his USPTO registered Trademarks (Rahul Manchanda USPTO Reg No 4,485,094 and Manchanda Law Office USPTO Reg No 4,504,612) in order to divert search engine revenue derived from Plaintiff's Trademark to their website in order for people to view and buy their advertised products, confusing Plaintiff's customers when typing in his name on the search engines in order to be diverted to their websites where they view and purchase their own paid advertising clients information, and other torts.

10. The remedies for trademark infringement which can be brought in either state or federal court under the Lanham Act are statutory and consist of: (a) injunctive relief; (b) an accounting for profits; (c) damages, including the possibility of treble damages when appropriate; (d) attorney's fees in

"exceptional cases;" and costs. These remedies are cumulative, meaning that a successful plaintiff may recover the Defendants's profits in addition to any damages, or other remedies awarded.

11. Invisible meta-tags used to lure internet search engines using a trademark is a "use in commerce" of the trademark. *North American Medical Corporation v. Axiom Worldwide, Inc.* (9th Cir. April 7, 2008).

12. As a result Plaintiff has suffered severe emotional distress, loss of business and personal relationships, has driven him further into bankruptcy and financial strife, loss of credibility, destroyed his relationships with family and friends, and has otherwise made him into an online pariah.

13. Due to the Defendants' illegal and unethical actions, misconduct, and bad behavior as described above, Plaintiff has been damaged in multiple claims each in an amount of $25,000 in actual and proximate damages, with punitive damages to be determined at trial.

14. Punitive Damages may be awarded when the fact-finder determines that the Defendants' conduct was wanton and reckless or malicious. Punitive damages may be awarded for conduct that represents a high degree of immorality and shows such wanton

dishonesty as to imply a criminal indifference to civi obligations. The purpose of punitive damages is not to compensate the plaintiff but to punish the Defendants for wanton and reckless or malicious acts and thereby to discourage the Defendants and others from acting in a similar way in the future. An act is malicious when it is done deliberately with knowledge of the plaintiff's rights, and with the intent to interfere with those rights. An act is wanton and reckless when it demonstrates conscious indifference and utter disregard of its effect upon the health, safety and rights of others. Punitive damages awards must be proportionate to the conduct of the Defendants as well as the harm to plaintiff, and must not be grossly excessive such that it would violate due process. When evaluating whether to invalidate a punitive damages award, courts consider the following factors: the degree of reprehensibility; the disparity between the harm or potential harm suffered and the punitive damages award; and the difference between this remedy and the civil penalties authorized or imposed in comparable cases. Punitive damages may not be covered by insurance in New York as a matter of public policy. *Hartford Acc. & Indem. Co. v. Vill. of Hempstead*, 48 N.Y.2d 218, 227, 397 N.E.2d 737 (1979).

WHEREFORE, Plaintiff requests a judgment against Defendants Google, Yahoo, and Microsoft Bing to de-index or remove the above referenced links from their search engines as well as:

a. On the first cause of action, **Defamation**, a judgment declaring that Defendants unlawfully defamed Plaintiff to the tune of $25,000;

b. On the second cause of action, **Libel**, a judgment declaring that Defendants unlawfully libeled Plaintiff to the tune of $25,000;

c. On the second cause of action, **Slander**, a judgment declaring that Defendants unlawfully slandered Plaintiff to the tune of $25,000;

d. On the Third cause of action, **Tortious Interference with Contract**, a judgment declaring that due to Defendants' actions Plaintiff has been unable to secure additional contracts with clients in damages of $25,000;

e. On the Fourth cause of action, **Breach of Fiduciary Duty**, a judgment declaring that Defendants caused injury to Plaintiff in damages of $25,000;

f. On the Fifth cause of action, **Breach of the Duty of Loyalty**, a judgment declaring that due to Defendants' disloyal actions Plaintiff has been irreparably damaged in damages of $25,000;

g. On the Sixth cause of action, **Unfair Trade Practices**, a

judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

h. On the Seventh cause of action, **False Advertising**, a judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

i. On the Eighth cause of action, **Unlawful Trespass**, a judgment declaring that due to Defendants' actions he has been irreparably damaged in damages of $25,000;

j. On the Ninth cause of action, **Civil RICO**, a judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

k. On the Tenth cause of action, **Unjust Enrichment**, a judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

l. On the Eleventh cause of action, **Intentional Infliction of Emotional Distress**, a judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

m. On the Twelfth cause of action, **Negligent Infliction of**

Emotional Distress, a judgment declaring that due to Defendants' actions Plaintiff has been irreparably damaged in damages of $25,000;

On the Thirteenth cause of action, **Trademark Infringement** in violation of the Lanham Act and other relevant statutes of my USPTO registered Trademarks (Rahul Manchanda USPTO Reg No 4,485,094 and Manchanda Law Office USPTO Reg No 4,504,612) in order to divert search engine revenue derived from my Trademarks/Advertising to them and to manipulate the search engine value of my trademarks on the internet, in order for people to buy their advertised products, confusing my customers to be diverted to their website where they consume their own paid ads for $25,000, including but not limited to an injunction, treble damages, attorneys fees, and an accounting for profits thereon.

Such other and further relief as the Court deems just and proper, including applicable interest and the costs and disbursements of this action.

New York, NY

Dated: April 2, 2016

Rahul Manchanda, Esq.

EXHIBIT A

Subject: YAHOO ADS USE OF MY PROTECTED TRADEMARKS TO MAKE MONEY FOR YAHOO
From: "Rahul Manchanda, Esq." <rdm@manchanda-law.com>
Date: 4/1/2016 6:16 PM
To: trademarkcomplaints@cc.yahoo-inc.com
BCC: rdm@manchanda-law.com

Dear Yahoo Ads Trademark Legal team:

It has come to my attention that Yahoo Ads is making money off of my protected Trademarks "RAHUL MANCHANDA" (USPTO 4485094) and "MANCHANDA LAW OFFICE" (USPTO 4504612) to the tune of almost $13 per click. See the attached screenshots and official trademarks. This is of course, as you know, unacceptable and is a *prima facie* violation of my protected marks. Please remove or de-index from your Yahoo Listings the following links which infringe my trademarks or I will be forced to file a trademark infringement suit:

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-threatened-to-kill-her/

http://www.ripoffreport.com/r/Manchanda-Law-Offices-Rahul-Manchanda/New York New York 10005/Manchanda-Law-Offices-Rahul-Manchanda-Lets-unite-and-fight-this-guy [illegible] won a fee-337859

http://www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manchanda-Rahul Rahul Manchanda Manchanda-Law-FirmRahul-Manchanda-Rahul-Manchanda-F-106599

http://www.complaintsboard.com/complaints/manchanda-law-office-pllc-new-york-new-york-c382370.html

http://consumercomplaints.com/shops-trade/594091-manchanda-law-firm-rahul-manchanda-complaints-reviews.html

Kind regards,

--
Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
New York, New York 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660

e-mail: rdm@manchanda-law.com
web: www.manchanda-law.com/MT_Rahul.html

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Licensed New York State Real Estate Broker

CLIENT TESTIMONIALS: http://www.manchanda-law.com/ClientTestimonials.html

BOOK CONSULTATION ONLINE AT https://squareup.com/appointments/book/YUJAEI/manchan

This electronic transmission is both personal and confidential, and contains privil

Attention: All foreign nationals (permanent residents and children included) are re

Download our Immigration Law Firm Brochure at
http://manchanda-law.com/MLO%20IMMIGRATION%20LAW%20BROCHURE.pdf

Screenshot (113).png

Subject: MICROSOFT BING ADS USE OF MY PROTECTED TRADEMARKS TO MAKE MONEY FOR MICROSOFT BING ADS
From: "Rahul Manchanda, Esq." <rdm@manchanda-law.com>
Date: 4/1/2016 6:03 PM
To: Buscond@microsoft.com, legal@microsoft.com
BCC: rdm@manchanda-law.com

Dear Microsoft Bing Ads Trademark Legal team:

It has come to my attention that Microsoft Bing Ads is making money off of my protected Trademarks "RAHUL MANCHANDA" (USPTO 4485094) and "MANCHANDA LAW OFFICE" (USPTO 4504612) to the tune of almost $13 per click. See the attached screenshots and official trademarks. This is of course, as you know, unacceptable and is a *prima facie* violation of my protected marks. Please remove or de-index from your Microsoft Bing Search Listings the following links which infringe my trademarks or I will be forced to file a trademark infringement suit:

http://www.ripoffreport.com/reports/directory/rahul-manchanda

http://www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manchanda-Rahul-Manchanda-Manchanda-Law-FirmRahul-Manchanda-Rahul-Manchanda-F_1065994

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-threatened-to-kill-her/

http://www.complaintsboard.com/complaints/manchanda-law-office-pllc-new-york-new-york-c382370.html

http://www.ripoffreport.com/r/manchanda-law-offices-rahul-manchanda/new-york-new-york-10005/manchanda-law-offices-rahul-manchanda-lets-unite-and-fight-this-guy-[illegible]dy-won-a-fee-337859

http://www.complaintsboard.com/complaints/manchanda-law-office-pllc-new-york-new-york-c382370.html

http://www.scamorg.com/manchanda-law-offices-amp-associates-pllc-cd

Kind regards,

--
Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor

New York, New York 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660

e-mail: rdm@manchanda-law.com
web: www.manchanda-law.com/MT_Rahul.html

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BOOK CONSULTATION ONLINE AT https://squareup.com/appointments/book/YUJAEI/manchanda

This electronic transmission is both personal and confidential, and contains privil

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Download our Immigration Law Firm Brochure at
http://manchanda-law.com/MLO%20IMMIGRATION%20LAW%20BROCHURE.pdf

Screenshot (114).png

Subject: GOOGLE ADWORDS USE OF MY PROTECTED TRADEMARKS TO MAKE MONEY FOR GOOGLE
From: "Rahul Manchanda, Esq." <rdm@manchanda-law.com>
Date: 4/1/2016 5:43 PM
To: ads-trademarks@google.com
BCC: rdm@manchanda-law.com

Dear Google Ads Trademarks Legal team:

It has come to my attention that Google Adwords is making money off of my protected Trademarks "RAHUL MANCHANDA" (USPTO 4485094) and "MANCHANDA LAW OFFICE" (USPTO 4504612) to the tune of almost $13 per click. See the attached screenshots and official trademarks. This is of course, as you know, unacceptable and is a *prima facie* violation of my protected marks. Please immediately remove or de-index from your Google Listings the following links which infringe my trademarks or I will be forced to file a trademark infringement suit:

http //www.ripoffreport.com/r/Manchanda-Law-Offices-Rahul-Manchanda/New-York-New York-10005/Manchanda-Law-Offices-Rahul-Manchanda-Lets-unite-and-fight-this-guy I-already-won-a-fee-337859

http //www.ripoffreport.com/r/Rahul-Manchanda/internet/Rahul-Manchanda-Rahul Dev Manchanda-Manchanda-Law-FirmRahul-Manchanda-Rahul-Manchanda-F 1065994

http://nypost.com/2015/06/01/woman-says-man-from-sugar-daddy-site-threatened-to-kill-her/

http://www.complaintsboard.com/complaints/manchanda-law-office-pllc-new-york-new york-c382370.html

http://usacomplaints.com/shops-trade/594091-manchanda-law-firm-rahul-manchanda-complaints-reviews.html

http://www.ripoffreport.com/r/Manchanda-Law/New-York-New-York-10005/Manchanda Law-Offices-Worst-Immigration-and-Deportation-Attorney-New-York-New-York-282791

Kind regards,

--
Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
New York, New York 10005
Tel: (212) 968-8600
Mob: (646) 645-0993

Fax: (212) 968-8601
Toll Free 24 Hour Hotline: (855) 207-7660

e-mail: rdm@manchanda-law.com
web: www.manchanda-law.com/MT_Rahul.html

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BOOK CONSULTATION ONLINE AT https://squareup.com/appointments/book/YUJAEI/manchand

This electronic transmission is both personal and confidential, and contains privil

Attention: All foreign nationals (permanent residents and children included) are re

Download our Immigration Law Firm Brochure at
http://manchanda-law.com/MLO%20IMMIGRATION%20LAW%20BROCHURE.pdf

Screenshot (114).png

United States of America
United States Patent and Trademark Office

RAHUL MANCHANDA

Reg. No. 4,485,094

Registered Feb. 18, 2014

Int. Cl.: 45

SERVICE MARK

PRINCIPAL REGISTER

RAHUL D. MANCHANDA (UNITED STATES INDIVIDUAL)
14 WALL STREET, 20TH FLOOR
NEW YORK, NY 10005

FOR: LEGAL SERVICES, IN CLASS 45 (U.S. CLS. 100 AND 101)

FIRST USE 3-1-2002; IN COMMERCE 3-1-2002.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE NAME "RAHUL MANCHANDA" IDENTIFIES A LIVING INDIVIDUAL WHOSE CONSENT IS OF RECORD.

SER. NO. 86-010,070, FILED 7-15-2013.

MELISSA VALLILLO, EXAMINING ATTORNEY

Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

United States of America
United States Patent and Trademark Office

MANCHANDA LAW OFFICES

Reg. No. 4,504,612

Registered Apr. 1, 2014

Int. Cl.: 45

SERVICE MARK

PRINCIPAL REGISTER

RAHUL D. MANCHANDA (UNITED STATES INDIVIDUAL)
14 WALL STREET, 20TH FLOOR
NEW YORK, NY 10005

FOR: LEGAL SERVICES, IN CLASS 45 (U.S. CLS. 100 AND 101).

FIRST USE 3-1-2002; IN COMMERCE 3-1-2002

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "LAW OFFICES" APART FROM THE MARK AS SHOWN.

SEC. 2(F)

SER. NO. 86-010,076, FILED 7-15-2013.

MELISSA VALLILLO, EXAMINING ATTORNEY

Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

Edit Details Bid strategy Automate

	Keyword	Campaign	Ad group	Status	Max. CPC	Clicks	Impr. ↓	CTR	Avg. Pos.	Qual. score	Match type	Cost
	Total - Search					4	70	5.71%	2.5	--	--	$19.14
☐	[IMMIGRATION LAWYER]	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$6.00	3	44	6.82%	2.6	7/10	Exact	$13.18
☐	[IMMIGRATION ATTORNEY]	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$6.00	0	6	0.00%	2.3	4/10	Exact	$0.00
☐	[FREE IMMIGRATION CONSULTATION]	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$6.00	1	4	25.00%	1.0	5/10	Exact	$5.96
☐	RAHUL MANCHANDA	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	0	2	0.00%	1.0	3/10	Broad	$0.00
☐	[NEW YORK IMMIGRATION ATTORNEY]	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$6.00	0	2	0.00%	2.0	5/10	Exact	$0.00
☐	[IMMIGRATION	BEST	BEST		$6.00	0	2	0.00%	2.5	4/10	Exact	$0.00

google.com

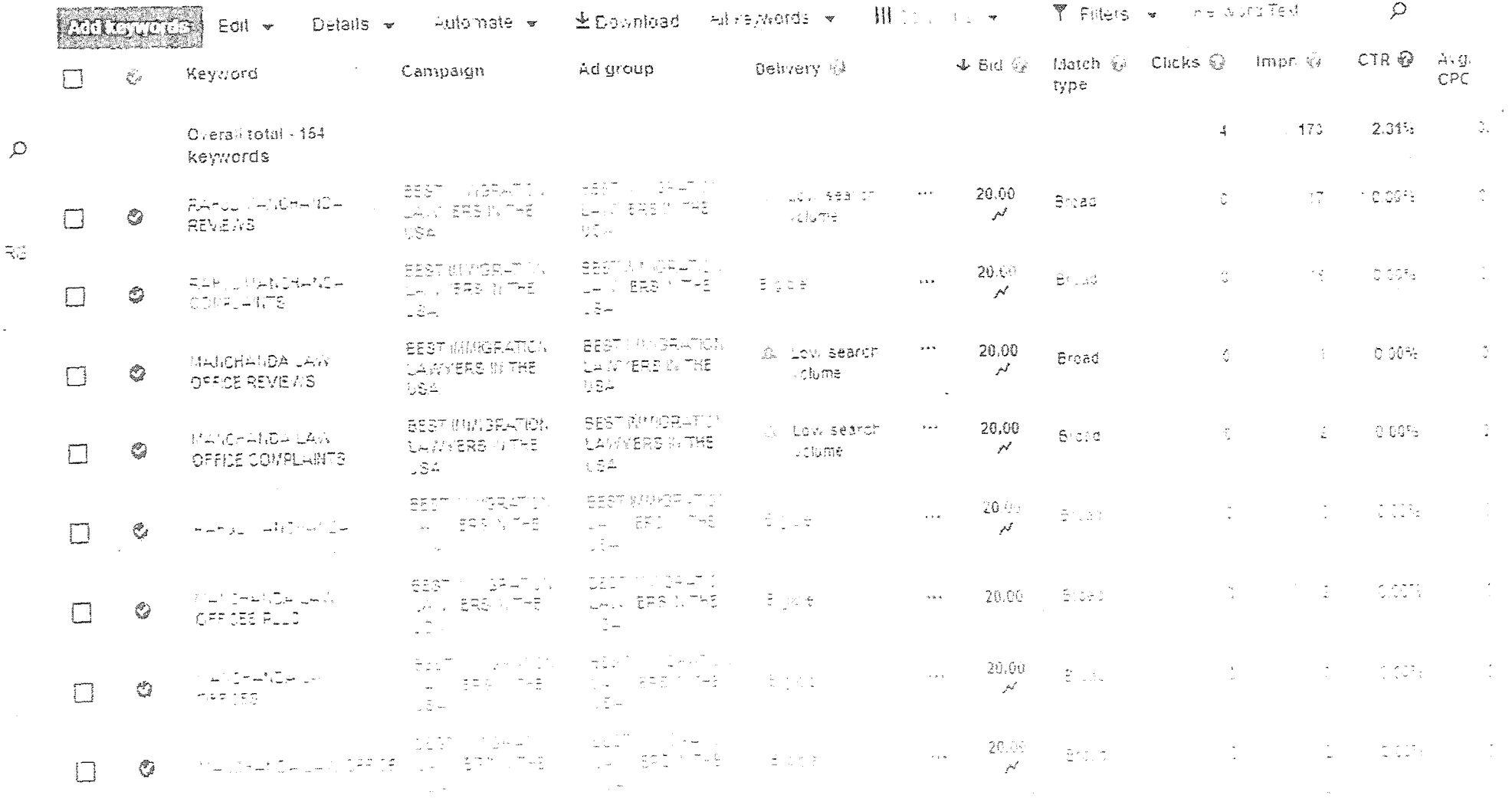
	Keyword	Campaign	Ad group	Status	Max. CPC	Clicks	Impr.	CTR	Avg. Pos.	Qual. score	Match type	Cost
	Total - Search					5	160	3.12%	3.1	--	--	$24.11
	RAHUL MANCHANDA	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	0	9	0.00%	1.0	3/10	Broad	$0.00
	MANCHANDA LAW OFFICES	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	2	1	200.00%	1.0	5/10	Broad	$8.82
	MANCHANDA LAW OFFICE	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	0	1	0.00%	1.0	5/10	Broad	$0.00
	MANCHANDA LAW OFFICES PLLC	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Low search volume	$20.00	0	0	0.00%	0.0	6/10	Broad	$0.00
	MANCHANDA LAW OFFICE COMPLAINTS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Low search volume	$20.00	0	0	0.00%	0.0	6/10	Broad	$0.00
	MANCHANDA LAW OFFICE REVIEWS				$20.00	0	0	0.00%	0.0	6/10	Broad	$0.00

google.com

		Keyword	Campaign	Ad group	Status	Max. CPC	Clicks	Impr.	CTR	Avg. Pos.	Qual. score	Match type	Cost
		Total - Search					5	160	3.12%	3.1	--	--	$24.11
			THE USA	THE USA									
☐		RAHUL MANCHANDA COMPLAINTS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	0	0	0.00%	0.0	6/10	Broad	$0.00
☐		RAHUL MANCHANDA REVIEWS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	$20.00	0	0	0.00%	0.0	6/10	Broad	$0.00
☐					Paused								
☐													
☐													
☐		IMMIGRATION ATTORNEYS			Eligible	$5.00	0	1	0.00%	4.0	6/10	Exact	$0.00

Add keywords | Edit | Details | Automate | Download | All keywords | Columns | Filters | Search

		Keyword	Campaign	Ad group	Delivery	Bid	Match type	Clicks	Impr.	CTR	Avg. CPC
		Overall total - 154 keywords						4	173	2.31%	3.
		[illegible] REVIEWS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Low search volume	20.00	Broad	0	17	0.00%	0
		[illegible] COMPLAINTS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	20.00	Broad	0	15	0.00%	0
		MANCHANDA LAW OFFICE REVIEWS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Low search volume	20.00	Broad	0	1	0.00%	0
		MANCHANDA LAW OFFICE COMPLAINTS	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Low search volume	20.00	Broad	0	0	0.00%	0
		[illegible]	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	20.00	Broad	1	2	0.00%	0
		[illegible] OFFICES PLLC	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	20.00	Broad	1	3	0.00%	2
		[illegible] OFFICES	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	20.00	Broad	1	1	0.00%	1
		[illegible] LAW OFFICE	BEST IMMIGRATION LAWYERS IN THE USA	BEST IMMIGRATION LAWYERS IN THE USA	Eligible	20.00	Broad	1	1	0.00%	


Add keywords
Edit
Details
Automate
Download
Filters
Keyword
Campaign
Ad group
Delivery
Bid
Match type
Clicks
Impr.
CTR
Avg. CPC
Overall total - 164 keywords
20.00
Broad
Low search volume

All Campaigns

Campaigns | Ad Groups | Settings | Ads | Keywords | Audience | Ad Extensions | Product Targets | Change History | Dimensions

View: Keywords

Add keywords | Edit | Details | Automate | Download | All keywords | Columns | Filters | Keyword Text

		Keyword	Campaign	Ad group	Delivery		Bid	Match type	Clicks	Impr.	CTR	Av CP
		Overall total - 154 keywords							2	403	0.50%	
☐	✓	R-[illegible]	[illegible]	[illegible]	[illegible]	···	20.00	Broad	[illegible]	[illegible]	[illegible]	
☐	✓	[illegible]	[illegible]	[illegible]	[illegible]	···	20.00	[illegible]	[illegible]	[illegible]	[illegible]	
☐	✓	[illegible]	[illegible]	[illegible]	[illegible]	···	20.00	[illegible]	[illegible]	[illegible]	[illegible]	
☐	✓	[illegible]	[illegible]	[illegible]	[illegible]	···	0.00	[illegible]	[illegible]	[illegible]	[illegible]	

EXHIBIT 2

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

RAHUL MANCHANDA, *Plaintiff,* -against- GOOGLE, YAHOO, MICROSOFT BING, *Defendants.*	Index No. CV-005886-16/NY Case No._____ **NOTICE OF REMOVAL TO FEDERAL COURT**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1338, 1441, and 1446, Defendant Yahoo! Inc., by and through its attorneys, and with full reservation of any and all defenses, objections, and exceptions, have filed a Notice of Removal of Civil Action in the United States District Court for the Southern District of New York on May 5, 2016. A copy of said Notice of Removal of Civil Action and its corresponding exhibits is attached as **Exhibit A**.

Dated: May 5, 2016
New York, NY

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Attorneys for Defendant Yahoo Inc.

AFFIRMATION OF SERVICE

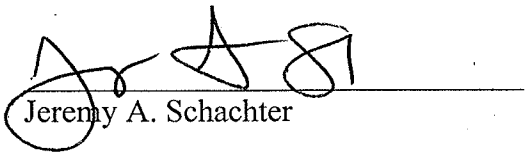
Jeremy A. Schachter, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms the following:

On this 5th day of May, 2016, I served a copy of the foregoing **Notice of Removal to Federal Court** upon counsel for Plaintiff by first class mail addressed as follows:

Rahul D. Manchanda, Esq.
MANCHANDA LAW OFFICE PLLC
30 Wall Street, 8th Floor
New York, New York 10005

A copy was also served via email to RDM@MANCHANDA-LAW.COM.

I hereby affirm under penalty of perjury, that the foregoing is true and correct.



Jeremy A. Schachter