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BEFORE THE UNITED STATES COPYRIGHT CLAIMS BOARD
LIBRARY OF CONGRESS

JULIE M. JOHNSON,

Claimant, **Docket No. 25-CCB-0121**

v.

SAMBO SAMPSON,

Respondent.

RESPONDENT'S RESPONSE TO PROPOSED FINDINGS OF FACT

Respondent Sambo Sampson, by and through undersigned counsel, respectfully submits this Response to the Board's Proposed Findings of Fact issued May 27, 2026, pursuant to 37 C.F.R. § 220.5(b) and 37 C.F.R. § 226.4. This Response is limited to five pages and relies solely upon evidence and testimony already in the record. Respondent does not contest the Proposed Findings of Fact except as specifically set forth below, and for each disagreement identifies the record evidence that contradicts the finding.

SPECIFIC FINDINGS IN DISPUTE

Proposed Finding No. 11. Respondent does not dispute that the record contains evidence that the design was listed or offered. Respondent disagrees with Proposed Finding No. 11 only to the extent it may be read to find that any sale of the allegedly infringing design was actually consummated. The record contains no evidence of any completed sale. Respondent's sworn Interrogatory Response No. 14 states that there were "zero sales," that "no customer purchase occurred," and that Respondent "did not complete any sale, did not receive payment, and did not deliver any product." Interrogatory Response No. 15 confirms that total revenue was $0 and that no profit was earned. This is corroborated by the Board's own Proposed Finding No. 14, which states that "Johnson has not presented evidence of any sales by Sampson," and by Proposed Finding No. 16, which reflects that the pads were given away rather than sold.

Proposed Finding No. 12. Respondent disagrees with Proposed Finding No. 12 to the extent it finds or implies that Respondent "continued to sell" the allegedly infringing design or that any sale occurred on or about March 2025 or at any other time. As set forth above, the record contains no evidence of any completed sale (Interrogatory Response Nos. 14 and 15; Proposed Finding No. 14).

FINDINGS NOT CONTESTED

Except as specifically stated above, Respondent does not contest the remaining Proposed Findings of Fact for purposes of this Response.

CONCLUSION

For the foregoing reasons, and based solely on the evidence and testimony already in the record, Respondent respectfully requests that the Board revise Proposed Findings Nos. 11 and 12 consistent with the record evidence cited above, and that the Board's findings reflect that no sale of the allegedly infringing design was consummated and that Respondent received no revenue or profit.

This the 17th day of June, 2026.

Respectfully submitted,

WOOTEN LAW OFFICE

s/ William A. Wooten
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CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing was filed and served on the Claimant through the Copyright Claims Board's eCCB electronic filing system and/ or by email to the Claimant at juliejohnsonsells@gmail.com.

This the 17th day of June, 2026.

s/ William A. Wooten
WILLIAM A. WOOTEN

Proof of Delivery

I hereby certify that on Wednesday, June 17, 2026, I provided a true and correct copy of the RESPONDENT'S RESPONSE TO PROPOSED FINDINGS OF FACT to the following:

Julie M Johnson, represented by Julie Ma Johnson, served via ESERVICE at juliejohnsonsells@gmail.com

Signed: /s/ WIlliam Wooten