

EXHIBIT B

From: **Intellectual Reserve, Inc.** <ip@intellectualreserve.org>

Date: Mon, Nov 24, 2025 at 2:40 PM

Subject: Re: Use of Church-Owned Trademarks and Copyrighted Materials

To: OSF Staff <staff@openstoriesfoundation.org>

Dear Mr. Dehlin,

Thank you for your response to my recent email. I share your desire to resolve this matter amicably and without the need for litigation. I have a suggestion on how we might do that. Rather than continuing to exchange emails trying to work through all the details elicited by your spreadsheet, why don't we sit down together with a neutral third party to help us reach a mutually acceptable resolution? The Church would be willing to pay the fees of a professional mediator with expertise in intellectual property matters. Any recommendations by the mediator would be non-binding unless accepted by both parties. Of course, you could be represented by legal counsel in the mediation if you wish. My experience is that when both sides approach mediation in good faith, an experienced, neutral mediator can often help the parties find an acceptable compromise.

There are some legal deadlines coming up for the Church to preserve its rights under trademark law. To avoid the necessity of filing litigation to maintain those rights, I propose we sign a standard "tolling" agreement under which the Church would agree not to file litigation against Open Stories Foundation until after the parties have the opportunity to seek a resolution through mediation. I have attached a suggested tolling agreement for your review and approval.

Finally, I want to reassure you that the Church absolutely respects your free speech right to determine the content of your podcast, including criticizing the Church. Our only concern is in protecting the

Church's copyrights and trademarks. I believe if we follow the process I have suggested, we can come to a resolution that works for everyone.

Barry V. Taggart

Manager

Intellectual Reserve, Inc.

[50 E. North Temple](#)

[Salt Lake City, UT 84150-0005](#)

ip@intellectualreserve.org

From: OSF Staff <staff@openstoriesfoundation.org>

Sent: Sunday, November 23, 2025 11:30 PM

To: Intellectual Reserve, Inc. <ip@intellectualreserve.org>

Subject: Re: [Ext:] Re: Use of Church-Owned Trademarks and Copyrighted Materials

Mr. Taggart,

A few updates!

- In the spirit of cooperation, I have replaced all blue Mormon Stories logos with orange Mormon Stories logos across all 4 of the platforms you requested..
- I have made sure that no remnant of the Christus is visible on Facebook or Youtube, as you requested.
- Please let us know what other changes you are requesting.
- As we have not hired Jen Tomchak to represent us in IP matters, please continue responding directly to me if you don't mind.
- As you stated in your original email, "The Church appreciates the fact that making the necessary changes in an orderly manner may require some time, and we are willing to work with you to minimize the impact to your business." As we do not have the financial resources that you do, we would prefer to avoid mediation or litigation and to address any requests you have this way, via email, if the spreadsheet idea is not to your liking.
- Please let me know what else you would like us to change and we would happily do our best to comply.

- We reiterate that we are acknowledging no wrongdoing or violation of trademark with these changes. We are simply seeking to cooperate in good faith, and like you, we desire to avoid mediation or litigation.

Thanks for your cooperation Mr. Taggart!

John Dehlin

On Tue, Nov 18, 2025 at 3:43 PM Intellectual Reserve, Inc. <ip@intellectualreserve.org> wrote:

Mr. Dehlin,

Thank you for your response. We appreciate the changes you have made and your willingness to engage with us.

Removing the light-rays design from the Mormon Stories logo on your YouTube page is a helpful start. We note that you have not removed the light-rays design from the logo on your Facebook, Instagram, or TikTok page or from the background of the banner on your Facebook page. We believe this is likely an oversight. While we appreciate that you blurred the Christus logo on your YouTube and Facebook banner, we believe any use of the Christus logo at the center of the official Church Symbol is inappropriate.

We also continue to have concerns about potential confusion caused by your use of the name Mormon Stories, including with other elements such as the color and font. The Church owns trademark registrations for marks incorporating the term MORMON, including MORMON, BOOK OF MORMON, BOOK OF MORMON STORIES, MORMON MESSAGES, MORMON CHANNEL, MORMON TABERNACLE CHOIR, MORMON BATTALION, BOOK OF MORMON VIDEOS, and MORMON HANDICRAFT. Examples of the Church's trademark registrations for its MORMON marks include U.S. Reg. Nos. 3,239,919, 2,883,572, 8018073, 7,840,811, 7,840,809, 7,840,810, 5,020,314, 5,020,309, 2,766,231, 2,913,694, 7,822,271, 7,642,460, 1,524,555, 6,142,065, 6,974,951, and 6,901,693.

We welcome your thoughts on what you could do to address the confusion caused by your use of the name Mormon Stories, together with other elements such as the color and font.

Finally, while we appreciate that you changed the image of President Nelson shown in my earlier email, we still believe the use of this updated image coupled with the title and the other elements referenced above, including the name Mormon Stories, is likely to cause confusion. For example, viewers may wrongly believe that the thoughts in the podcast episode promoted by the image might be President Nelson's. We are happy to discuss what images of Church leaders are available and the context in which they might be used.

As we stated previously, the Church appreciates the fact that making changes to your branding may require some time, and we are more than happy to work with you provided we are cooperating in good faith and making reasonable progress toward a mutually acceptable resolution. We hope we can continue to work with you to amicably resolve the Church's intellectual property concerns.

Barry V. Taggart

Manager

Intellectual Reserve, Inc.

[50 E. North Temple](#)

[Salt Lake City, UT 84150-0005](#)

ip@intellectualreserve.org

From: OSF Staff <staff@openstoriesfoundation.org>
Sent: Saturday, November 15, 2025 6:11 AM
To: Infringements <Infringements@ChurchofJesusChrist.org>
Cc: openstoriesboard@gmail.com; MormonStories@gmail.com
Subject: [Ext:] Re: Use of Church-Owned Trademarks and Copyrighted Materials

[External Email]

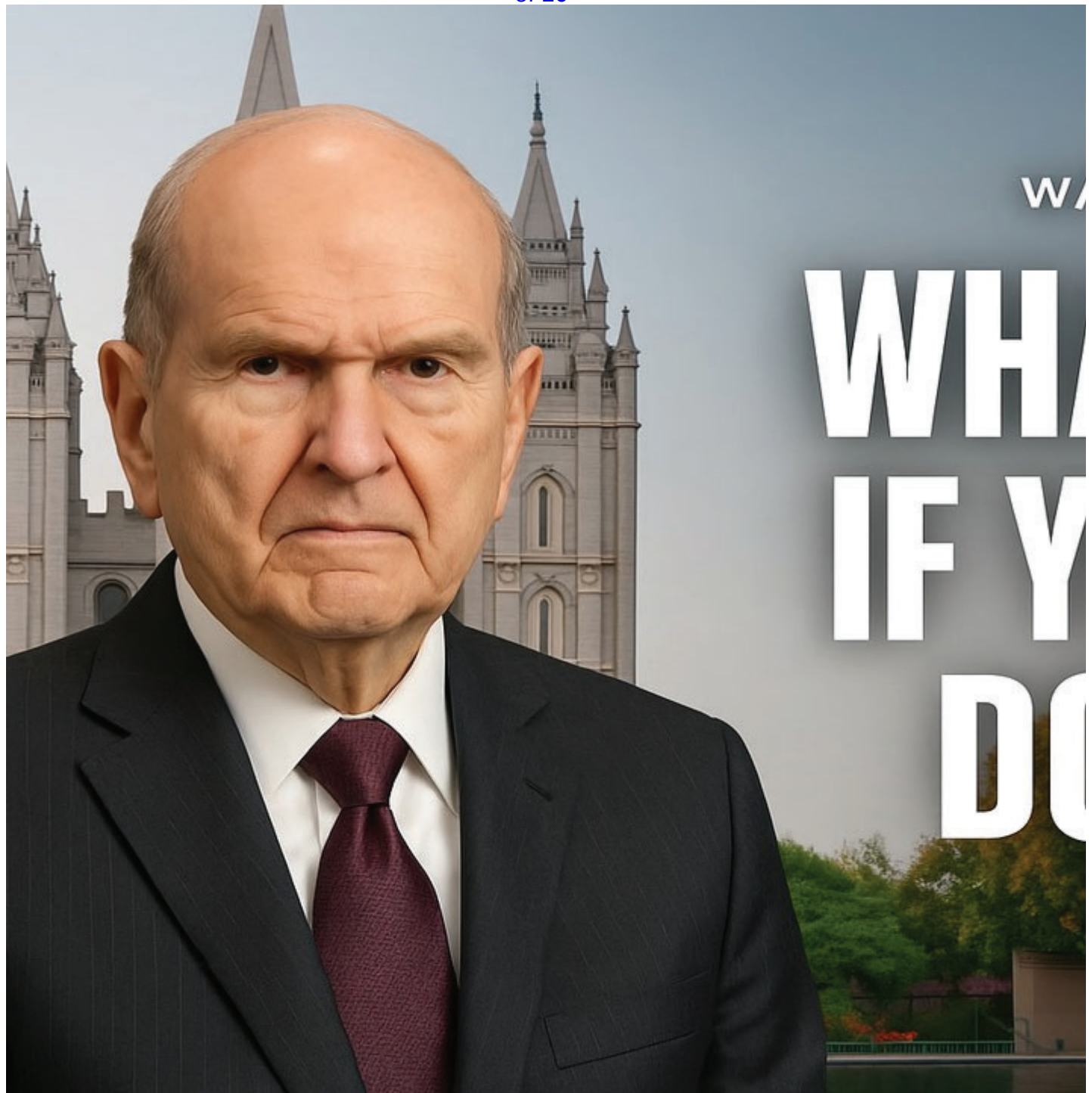
You don't often get email from staff@openstoriesfoundation.org. [Learn why this is important](#)
Barry,

Thanks for writing! We certainly hope that we are not in violation of any laws, but want to engage in good faith. A few quick things:

1) I have blurred out the image of the Christus on our YouTube banner. <https://www.youtube.com/mormonstories>

2) I have blurred out the image of the Christus on the Facebook banner. <https://www.facebook.com/mormonstories/>

- 3) I have ensured that the Mormon Stories logo on YouTube does not include any rays.
- 4) Can you please share with me the text/source of all relevant trademark claims so that I can understand them better?
- 5) Can you please provide screen shots and URL's of any other specific places where you believe that I am violating the trademark laws?
- 6) I have recreated the thumbnail you provided and updated it to use a non-copyrighted image of President Nelson. Are there other thumbnails that you believe violate any laws? If so, please let me know.



I hope this resolves most of your concerns! Let me know if you have others! Will incorporate in any way we can. Please know that I am not a graphic designer, and have limited graphic design staff, so it may take me time to make changes you request that we feel are reasonable. Also, please know that we are not acknowledging the violation of any laws by accommodating your request. We're simply trying to engage in good faith.

Thanks!

John

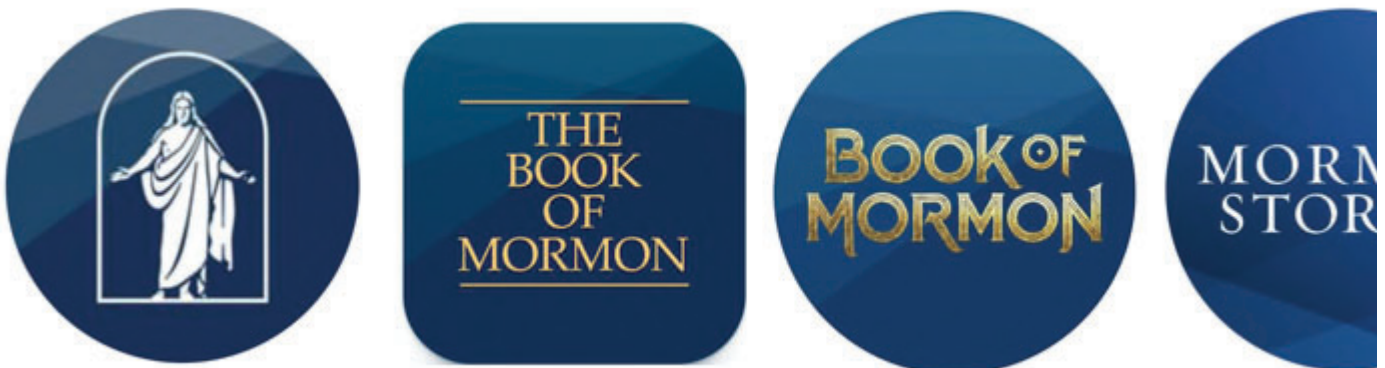
On Fri, Nov 14, 2025 at 9:00 AM Intellectual Reserve, Inc. <ip@intellectualreserve.org> wrote:

Dear Mr. Dehlin,

I'm reaching out to you regarding trademarks and copyrighted materials used by Open Stories Foundation. My name is Barry Taggart, and I manage the Intellectual Property Office of The Church of Jesus Christ of Latter-day Saints. Part of my responsibilities is to help maintain the integrity of trademarks and copyrights owned by the Church.

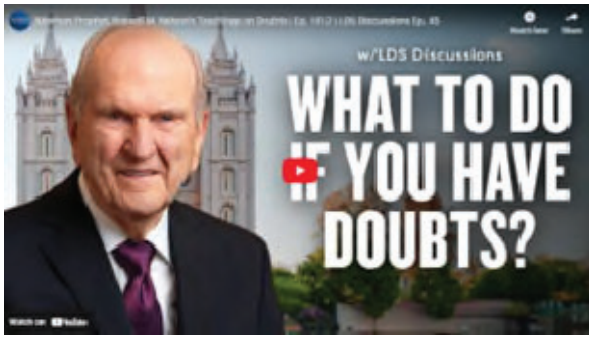
My office has received questions and comments from the public regarding materials on the "Mormon Stories" [website](#), [YouTube page](#), and other social media pages that feature Church trademarks and copyrights. While the Church respects your right to host a podcast, operate a website, and maintain an online brand, the Church has an obligation to protect its trademarks as unique identifiers to prevent confusion about what is and isn't official Church content.

For example, the "Mormon Stories" name and logo (shown below) incorporate Church trademarks including the word "Mormon" and a "light-rays" design, both of which are registered trademarks of the Church. The headers of your podcast's [YouTube](#) and [Facebook](#) pages similarly feature the Christus logo at the center of the official Church Symbol, another registered trademark of the Church. Using these trademarks is likely to create confusion among viewers, especially when combined with a color scheme and font that mimic those used by the Church.



The "Mormon Stories" [website](#), [YouTube page](#)

, and other social media pages that are used to promote your business and podcast likewise feature pictures copyrighted by the Church, such as the image of President Russell M. Nelson shown below.



Using trademarks and copyrights in this way makes it likely that a person seeing your iconography would reasonably—but wrongly—assume they are viewing Church-affiliated or -sponsored content.

For these reasons, we ask you to agree that you will remove and discontinue use of the Church's trademarks and copyrighted materials on your platforms. The Church respects your right to free speech and has no desire to censor your podcast, website, or social media accounts in any way. Our request is that you update elements of your branding to ensure viewers can distinguish your content from Church content.

This request is consistent with the Church's response to trademark infringement. Our first step when we address an infringement, whether by a Church member or not, is typically to notify the individual and give them the opportunity to make the necessary adjustments.

The Church appreciates the fact that making the necessary changes in an orderly manner may require some time, and we are willing to work with you to minimize the impact to your business.

Please feel free to contact me if you have any questions. Please let me have your response within the next 10 days.

Sincerely,

Barry V. Taggart

Manager

Intellectual Reserve, Inc.

[50 E. North Temple Street](#)

[Salt Lake City, UT 84150-0005](#)

ip@intellectualreserve.org

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John Dehlin, Ph.D. (He/Him/His)

Host of [Mormon Stories](#) Podcast

CEO, OPEN STORIES FOUNDATION

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For Faith Crisis Coaching: <http://johndemlin.com>

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