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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

INTELLECTUAL RESERVE, INC., a Utah
non-profit corporation; THE CHURCH OF
JESUS CHRIST OF LATTER-DAY
SAINTS, a Utah corporation sole,

Plaintiffs,

vs.

OPEN STORIES FOUNDATION, an
Arizona non-profit corporation; JOHN P.
DEHLIN, an individual,

Defendants.

**DEFENDANTS' REPLY IN
FURTHER SUPPORT OF
MOTION TO DISMISS**

Civil No. 2:26-CV-00321

Judge Robert J. Shelby
Magistrate Judge Jared C. Bennett

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Defendants present this memorandum in support of their Motion to Dismiss (ECF 41; “Motion”) and in reply to the Memorandum in Opposition (ECF 71; “Opposition” or “Opp.”) filed by Plaintiffs (collectively, “the Church”).

INTRODUCTION

The Church begins its Opposition explaining that (a) Defendants’ use of MORMON STORIES does *not* alone violate its trademark rights, (b) the Church’s claims are based solely on *combining* design elements in 2022 with the podcast title, (c) the Church seeks *only* injunctive relief, not damages, for trademark claims, and (d) Defendants are free to “use *Mormon* in connection with [the] podcast.” Opp. at 1-3. All of which begs the question: Why are we here? Defendants ceased using the accused 2022 design elements weeks before the lawsuit was filed.¹ Because the Church has clarified the scope of its claims, it should at least be required to amend the Complaint accordingly.

The Church continues its effort to *false*ly paint Defendants as deceptive by *misrepresenting* MORMON STORIES episode 1678 and falsely claiming the guest “tells Mr. Dehlin ... he believed Mormon Stories was Church-affiliated.” Opp. at 2. There is a reason the Church *did not quote* the guest; he said no such thing. The guest actually said, “I ... typed in Mormons, saw Mormon Stories, and I was like, perfect, stories about Mormons.”² His first impression was *accurate*, and nothing he said suggests a belief the podcast was “Church-affiliated.” The Church’s insinuation that Mr. Dehlin named the podcast intending to suggest Church affiliation is a fabrication.³

¹ See Counterclaim ¶¶ 221-34 (ECF 42).

² See Episode 1678 at 1:36:10 (<https://www.mormonstories.org/1678-tommy-madison-johnson/>).

³ Upon learning from a TikTok post that he was unexpectedly brought into this case by the Church, this guest expressed what was already clear from his 2022 interview—he “never once

Believing something is “about Mormons” is not a belief that it is “Church-affiliated.” This improper conflation of uncertainty regarding the *content* of the podcast with uncertainty about who *sponsors* the podcast is a sleight-of-hand and error of law that underlies all the Church’s claims. The ease with which the Church misrepresents facts to level accusations of deceptive intent at Mr. Dehlin is troubling and highlights concerns expressed by the Electronic Frontier Foundation about “the coercive power of dubious trademark claims.” *See* ECF 70 at 8.

ARGUMENT

I. THE CHURCH’S TRADEMARK CLAIMS VIOLATE DEFENDANTS’ FIRST AMENDMENT RIGHTS

A. *Jack Daniel’s* Does Not Preclude Defendants’ First Amendment Defense

The Church cites *Jack Daniel’s Props., Inc. v. VIP Prods. LLC*, 599 U.S. 140 (2023) to argue the First Amendment is irrelevant here, because the MORMON STORIES name operates as Defendants’ trademark. *Opp.* at 4-14. However, the Supreme Court recognizes that trademarks “often have an expressive content” conveying “powerful messages” properly protected by the First Amendment from enforcement of the Lanham Act. *Matal v. Tam*, 582 U.S. 218, 239 (2017). Just because trademarks can be a form of “commercial speech” does not mean they are subject to “a blanket exemption” from First Amendment protections. *Id.* at 251.

Jack Daniel’s did *not* impose a blanket exemption from First Amendment protections to all trademark claims asserted against a term used as a trademark. Rather, the Supreme Court recognized that in “rare situations” the likelihood of confusion test will *not* do “enough work to account for the [Defendants’] interest in free expression” under the First Amendment. *Id.* at 159.

thought the show was from the Church itself.” *See*
<https://www.tiktok.com/@analyzing.mormonism/video/7681399626968091917>.

The unique and unprecedented facts of this case present such a situation, as evidenced by the Complaint allegations and other evidence subject to judicial notice.⁴

First, in 2018, the Church announced a *speech regulation* objective independent of trademark rights, wherein then President Russell Nelson declared that the term “Mormon” is offensive to the Church and God and *should not be used*. Ex. A, #7-8; Exs. E, F, G. Thus, the MORMON STORIES title stands *independently* as a non-commercial, First Amendment expression in defiance of that view.

Second, the Church combined this declaration with a wholesale *abandonment* of MORMON as a trademark, *see* Exs. E, F, H, acknowledging the decision would be “unwise” if it was about “branding a man-made organization,” but that religious convictions override concerns about trademark rights. Ex. G. This “institutionalize[d]” rebranding reportedly included updating 300 web-based apps, acquiring 800 domain names, and renaming over 1,000 products including the Church’s “biggest brands.” Exs. I and J.

Third, the Church made no trademark objection to the MORMON STORIES podcast for two decades. *See* Motion at 17-20.

Fourth, the Church’s belated enforcement efforts coincided with a change in leadership after President Nelson passed. In his first major address as President, just two months before the Complaint, Dallin Oaks warned Church members about “false information in podcasts.” Ex. K.

Against this backdrop, the call for First Amendment protection looms large and demands heightened scrutiny to ensure the Church’s enforcement of the Lanham Act does not constitute

⁴ *See* Motion at 1, 4-5, n. 1 & 2. Like the articles cited in Exhibits A-B to the Motion, the news articles attached to this Reply as Exhibits E-K are properly the subject of judicial notice.

government-assisted viewpoint discrimination. *See Matal*, 582 U.S. at 251 (applying “heightened scrutiny” when action against a trademark is premised on “disagreement with the message it conveys”). The Church should not be permitted to wield federal trademark law to suppress a term the Church declared offensive and publicly abandoned as a trademark, regardless of any colorable claim of trademark infringement (which Defendants dispute). This case is unique and falls into the rare circumstances the Supreme Court alluded to in *Jack Daniel’s*, wherein the First Amendment should override a trademark infringement claim even if the accused term is used as a trademark.

An injunction against Defendants’ use of MORMON STORIES would employ governmental authority to suppress a religion-focused message that the Church finds offensive, does not want used in public discourse, and *no longer identifies as its brand*. The Court should dismiss Plaintiffs’ trademark counts under the First Amendment.

B. Plaintiffs’ Claims Should be Dismissed under *Rogers* and *Stouffer*

The Church does not substantively address Defendants’ arguments under *Stouffer*, *see* Opp. at 14 n. 4, leaving them unrebutted. *See* Motion at 7-11. As to the *Rogers* test, the Church contends that *Rogers* does not apply to claims against Defendants’ use of certain design elements (*e.g.*, colors, fonts, images, etc.). *See* Opp. at 15. But Defendants’ First Amendment defense is only asserted to the extent the Church seeks to enjoin the MORMON STORIES name itself.

The Church cites its *conclusory* Complaint allegations of deceptive intent as negating the “artistic relevance” factor under *Rogers*. *Id.* at 16. However, “deceptive intent must be pled with sufficient particularity,” *Lutron Elecs. Co., Inc. v. Crestron Elecs., Inc.*, 2012 WL 3192806 at *4 (D. Utah, Aug. 6, 2012), and the Court need only accept “well-pleaded facts, as distinguished from

conclusory allegations,” as true, *Moss v. Kopp*, 559 F.3d 1155, 1159, n.1 (10th Cir. 2009).⁵ Indeed, the case the Church relies on *dismissed* the infringement claims under *Rogers*, recognizing the “artistic relevance” factor “is purposely low and will be satisfied unless the use ‘has no artistic relevance to the underlying work whatsoever.’” *Louis Vuitton Malletier S.A. v. Warner Bros. Entm’t Inc.*, 868 F.Supp.2d 172, 178 (S.D.N.Y. 2012) (quoting *Rogers*).

The Church cites *Gordon v. Drape Creative Inc.*, 909 F.3d 257 (9th Cir. 2018) to argue that the “explicitly misleading” factor is too ambiguous at this stage. Opp. at 16-17. But *Gordon* recognized that “consumers ‘do not expect [titles] to identify’ the ‘origin’ of the work,” and that when used “in the title of an expressive work ... the mark obviously serve[s] as only one ‘element’ of the [work]” and cannot be explicitly misleading. *Id.* at 270-71 (citing 6 McCarthy on Trademarks & Unfair Comp. (“McCarthy”) § 31:144.50 (“[T]he deception or confusion must be relatively obvious and express, not subtle and implied.”)). That is the case here; the MORMON STORIES name is only one element of the overall expressive content of the podcast. No part of Defendants’ use of “Mormon” can be characterized as explicitly misleading.

Finally, the Church argues that Defendants’ use of disclaimers is insufficient to *prevent confusion*. Opp. at 17-19. But the *Rogers* test asks whether Defendants’ conduct is *explicitly* misleading, not whether Defendants sufficiently accommodated Plaintiffs’ request for disclaimers. Allegedly inadequate disclaimers cannot reasonably be viewed as *explicitly* misleading, particularly where courts in the Tenth Circuit view disclaimers as negating confusion. *See, e.g., Klein-Becker USA, LLC v. Prod. Quest Mfg.*, 429 F. Supp. 2d 1248, 1258 (D. Utah 2005); *Univ.*

⁵ The Church’s only attempt to present factual allegations of deceptive intent is the *misleading* podcast citation in the Introduction of the Opposition. *See* Introduction, *supra*.

of Kan. V. Sinks, 565 F. Supp. 2d 1216, 1254 (D. Kan. 2008).

The tests under *Rogers* and *Stouffer* are satisfied and Plaintiffs' trademark claims should be dismissed on First Amendment grounds.

II. PLAINTIFFS' TRADEMARK CLAIMS ARE BARRED BY LACHES

A. Laches Is Established by the Complaint Allegations

Plaintiffs characterize laches as a "highly factual" defense that "generally cannot be resolved on a motion to dismiss," Opp. at 19, but gloss over the well-established authority that laches may be resolved at the pleading stage when, as here, the complaint alleges the factual basis for each element. *See* Motion at 15.

The Church ignores the facts⁶ in its own Complaint that establish both elements of laches. For delay, the Complaint shows: Defendants have used MORMON STORIES since 2005 (Compl. ¶ 32); their use has been open and notorious on YouTube, Apple, Spotify, Amazon, TikTok, and Instagram (¶¶ 36-37); the Church waited *twenty years* before contacting Defendants (¶ 51, Ex. 5); and the Church is a sophisticated 200-year-old institution with 17 million members and, thus, properly charged with knowledge of Defendants' open use at or shortly after 2005 (¶¶ 14-15). For prejudice, the Complaint establishes: MORMON STORIES amassed 300,000 subscribers, created over 2,000 episodes, and was featured on Good Morning America, Newsweek, NPR, and The New York Times (¶ 41), Dehlin formed OSF in 2010 to advance the podcast's mission (¶ 32); and Defendants expanded onto national platforms and launched additional Mormon-themed podcasts (¶¶ 36-38). It is entirely appropriate to find that laches bars Plaintiffs' trademark claims at the

⁶ In addition to the Complaint allegations, *all facts* provided in Defendants' Motion papers are properly before the Court. Motion at 4-5, n.1-2.

pleading stage.

B. The Church's Twenty-Year Delay Is Inexcusable

The Church does not deny it knew or should have known of Defendants' use of MORMON STORIES from the beginning. Instead, it relies on a progressive encroachment theory, arguing that design elements adopted in 2022 crossed the infringement line and excuse its decades-long delay. This theory does not save the Church's claims.⁷

1. Defendants' activity was insufficient to reset the laches clock

Progressive encroachment is sharply limited and does not provide a blanket excuse for the Church's egregious delay. Rather, it applies only where a junior user materially alters the nature or direction of its activity in a way that creates a new and distinct basis for infringement. *See, e.g., Oriental Fin. Gp., Inc. v. Cooperativa de Ahorro Y Crédito Oriental*, 698 F.3d 9, 21–22 (1st Cir. 2012). Plaintiffs have not identified a material alteration here.

A defendant's "growth of its existing business and the concomitant increase in its use of the mark do not constitute progressive encroachment." *Tillamook Country Smoker, Inc. v. Tillamook County Creamery Ass'n*, 465 F.3d 1102, 1110 (9th Cir. 2006) (rejecting progressive encroachment argument after a twenty-five year delay, finding defendant's label redesign and expanding sales channels to be "normal business growth, not progressive encroachment"); *see also Kars 4 Kids Inc. v. Am. Can!*, 98 F.4th 436, 449 (3d Cir. 2024) (same; twelve-year delay barred injunctive relief); *Wisconsin Cheese Group, Inc. v. V & V Supremo Foods, Inc.*, 537 F. Supp. 2d

⁷ The Church relies on Sixth Circuit law, *see Opp.* at 21 (citing *DayCab Co., Inc. v. Prairie Tech., LLC*, 67 F.4th 837 (6th Cir. 2023)), and cites no authority showing the Tenth Circuit has ever adopted the progressive encroachment doctrine.

994, 1001–02 (W.D. Wis. 2008) (fourteen-year delay not excused by progressive encroachment despite increased sales and cosmetic brand modifications). Defendants’ activity over twenty years fits squarely within the normal growth category and cannot excuse the Church’s egregious delay. *See id.*

2. Even if the clock resets in 2022, the Church’s delay is inexcusable

Even if the Court accepted Plaintiffs’ theory that adopting the blue logo in 2022 reset the laches clock, Plaintiffs still waited three years before filing suit. That delay triggers the presumption of laches, which Plaintiffs do not rebut.⁸

3. At minimum, laches bars claims against pre-2022 conduct

The Church’s progressive encroachment theory is premised on Defendants’ conduct not ripening into actionable infringement until 2022. Opp. at 22. If so, Defendants’ pre-2022 use of MORMON STORIES and other design elements was *not infringing* and is not actionable. *See, e.g.,* 4 McCarthy § 31:20 (“delay for laches is measured . . . from the date when infringement ‘became actionable and provable.’”); *Kellogg Co. v. Exxon Corp.*, 209 F.3d 562, 569 (6th Cir. 2000) (“Implicit in a finding of laches . . . is the presumption that an underlying claim for infringement existed at the time at which we begin to measure the plaintiff’s delay.”); *What A Burger of Va, Inc. v. Whataburger, Inc.*, 357 F.3d 441, 449 (4th Cir. 2004) (“[T]he court should be trying to determine the time at which the use became infringing and the time at which the owner

⁸ Plaintiffs argue the Tenth Circuit has not adopted the presumption of laches based on the analogous limitations period. Opp. at 20, n.6. This Court, however, has recognized such a presumption and concluded the Tenth Circuit would do so if presented the opportunity. *See Albion Int’l, Inc. v. Am. Int’l Chem., Inc.*, No. 2:10-cv-00785, 2012 WL 3776866, at *4 (D. Utah Aug. 30, 2012).

should have known it.”). This comports with the Church’s concession that use of MORMON STORIES as the podcast title alone is not infringing. *See* Opp. at 1, 11, n.3. Accordingly, even if progressive encroachment allows claims against 2022 design elements, laches should still bar claims as to the MORMON STORIES name and all pre-2022 design elements.

C. Defendants Have Suffered Substantial Prejudice

Prejudice is established “when the defendant has expended substantial time and effort during the delay.” *Biodiversity Conservation All. v. Jiron*, 762 F.3d 1036, 1091 (10th Cir. 2014); *see also GTE Corp. v. Williams*, 649 F. Supp. 164, 176 (D. Utah 1986), *aff’d*, 904 F.2d 536 (10th Cir. 1990). Here, Defendants’ prejudice goes far beyond “mere expenditures” as Plaintiffs downplay.⁹ During the Church’s twenty years of inaction, Defendants formed a nonprofit, created a family of MORMON podcasts, produced thousands of hours of content, cultivated an audience of hundreds of thousands, and achieved national media recognition. Compl. ¶¶ 32, 36–38, 41. Defendants built their professional and organizational identity around the MORMON STORIES name, which the Church knowingly allowed over two decades.

D. Laches Bars Injunctive Relief in This Case

Contrary to Plaintiffs’ assertions, laches may bar both legal and *equitable* relief. *See, e.g., Kars 4 Kids*, 98 F.4th at 451; *Hot Wax*, 191 F.3d at 821; *Pinkette Clothing, Inc. v. Cosmetic Warriors Ltd.*, 894 F.3d 1015, 1027 (9th Cir. 2018). A grossly lengthy delay, such as 20 years, is often considered a “plus factor” justifying laches to “bar final injunctive relief.” 4 McCarthy § 31:7

⁹ Plaintiffs’ reliance on *Hot Wax* is misplaced as it favors Defendants. The Seventh Circuit recognized that a twenty-year delay caused prejudice sufficient to support a laches defense. *See Hot Wax, Inc. v. Turtle Wax, Inc.*, 191 F.3d 813, 824 (7th Cir. 1999).

(citing cases); *Henderson v. Lindland*, 2013 WL 1181957, at *7 (C.D. Cal. Mar. 21, 2013) (citing McCarthy; delay of “over a decade” is a “plus factor” for laches barring injunction); *Miller v. Glenn Miller Productions, Inc.*, 454 F.3d 975 (9th Cir. 2006) (twenty-year delay barred all claims); *Hot Wax*, 191 F.3d 813 (same).¹⁰

E. Plaintiffs’ Willful Infringement Allegations Do Not Defeat Laches

Plaintiffs attempt to circumvent laches by alleging that Defendants willfully infringed their marks. But, as explained above, the Church’s conclusory allegations of deceptive intent need not be accepted, and the Church’s only attempt to present actual facts of willfulness was outside the Complaint and was itself misleading. *See* Introduction, Section I.B *supra*.¹¹

III. THE CHURCH SHOULD AMEND ITS PLEADED TRADEMARK THEORIES

The Opposition clarifies that “all Plaintiffs seek on their trademark claims” is “obtaining injunctive relief” and that its trademark claims are based solely on the adoption of certain design elements in 2022, *not* the MORMON STORIES title. Opp. at 1, 3, 21-23. The Complaint does not track these positions—it seeks trademark damages under § 1117 and to enjoin all use of “Defendants’ Marks,” including the title. Compl. ¶ 35, Prayer ¶ C. To ensure proper notice and

¹⁰ Plaintiffs also suggest evidence of “strong” or “inevitable” confusion precludes laches. Opp. at 26. But the “inevitable confusion” exception requires proof that Defendant’s service are “harmful or otherwise a threat to public safety,” which Plaintiffs do not allege. *Tillamook*, 465 F.3d at 1111. And Plaintiffs’ allegations of actual confusion, Compl. ¶ 54, even if believed, are de minimis considering 20 years of coexistence. *See Hornady Mfg. Co. v. Doubletap, Inc.*, 746 F.3d 995, 1005 (10th Cir. 2014).

¹¹ Plaintiffs rely on inapposite cases, *DC Comics v. Towle*, 802 F.3d 1012, 1026 (9th Cir. 2015), and *Harley-Davidson, Inc. v. Grottanelli*, 164 F.3d 806, 813 (2d Cir. 1999), for the proposition that willful infringers cannot invoke laches. But neither case holds that conclusory allegations of intent suffice to defeat laches. Plaintiffs also cite *Societe des Bains de Mer v. MGM Mirage*, 2008 WL 4974800 (S.D.N.Y. Nov. 24, 2008), but that case considered specific factual allegations supporting deliberate copying—facts conspicuously absent from the Complaint here.

clarity, the Court should order the Church to amend the Complaint accordingly.

IV. PLAINTIFFS' COPYRIGHT CLAIM SHOULD BE DISMISSED

Plaintiffs contend they need not provide allegations about the timing of alleged infringement, citing *After II Movie v. Wideopenwest Fin.*, 2025 WL 4696630 (D. Colo. Mar. 14, 2025). But the complaint in *After II* had such allegations and even cited the plaintiffs' demand letters specifying "the time of infringement down to the second." *Id.* at *4. The Court should accept Plaintiffs' offer, *see* Opp. at 32, and order Plaintiffs to amend the Complaint to include the requisite factual allegations regarding the timing of the alleged infringement.

CONCLUSION

Defendants respectfully move the Court to dismiss Counts I-IV of the Complaint.

Dated: September 21, 2026

Respectfully submitted,

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CERTIFICATION UNDER D.U.CIV.R. 7-1(a)(6)

I, Mark A. Miller, certify that this **Reply in Further Support of Motion to Dismiss** contains 3,094 words and complies with DUCivR 7-1(a)(4).

/s/ Mark A. Miller

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Defendants.

**DEFENDANTS' REPLY IN
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MOTION TO DISMISS**

EXHIBITS E-K

Civil No. 2:26-CV-00321

Judge Robert J. Shelby
Magistrate Judge Jared C. Bennett

EXHIBIT E

LEADERS & MINISTRY

'Mormon' is out — Church releases statement on name of organization

16 Aug 2018, 1:19 p.m. MDT



By **Sarah Jane Weaver, Jason Swensen**

The Church issued the following statement from President Russell M. Nelson on Aug. 16 regarding the name of the Church:

The Lord has impressed upon my mind the importance of the name He has revealed for His Church, even The Church of Jesus Christ of Latter-day Saints. We have work before us to bring ourselves in harmony with His will. In recent weeks, various Church leaders and departments have initiated the necessary steps to do so. Additional information about this important matter will be made available in the coming months.

The Church has released an updated Newsroom style guide, which provides direction on how to properly refer to The Church of Jesus Christ of Latter-day Saints. In the coming months, Church websites and materials will be updated to reflect this direction from President Nelson.

Following is the updated style guide:

The official name of the Church is The Church of Jesus Christ of Latter-day Saints. The full name was given by revelation from God to Joseph Smith in 1838.

In the first reference, the full name of the Church is preferred: "The Church of Jesus Christ of Latter-day Saints."When a shortened reference is needed, the terms "the Church" or the "Church of Jesus Christ" are encouraged. The "restored Church of Jesus Christ" is also accurate and encouraged.While the term



A meetinghouse for The Church of Jesus Christ of Latter-day Saints in Salt Lake City. | Scott G Winterton, Deseret News

"Mormon Church" has long been publicly applied to the Church as a nickname, it is not an authorized title, and the Church discourages its use. Thus, please avoid using the abbreviation "LDS" or the nickname "Mormon" as substitutes for the name of the Church, as in "Mormon Church," "LDS Church," or "Church of the Latter-day Saints." When referring to Church members, the terms "members of The Church of Jesus Christ of Latter-day Saints" or "Latter-day Saints" are preferred. We ask that the term "Mormons" not be used. "Mormon" is correctly used in proper names such as the Book of Mormon or when used as an adjective in such historical expressions as "Mormon Trail." The term "Mormonism" is inaccurate and should not be used. When describing the combination of doctrine, culture and lifestyle unique to The Church of Jesus Christ of Latter-day Saints, the term "the restored gospel of Jesus Christ" is accurate and preferred. When referring to people or organizations that practice polygamy, it should be stated that The Church of Jesus Christ of Latter-day Saints is not affiliated with polygamous groups.

President Nelson has long championed the use of the Church's divinely given name.

More than 28 years ago, then-Elder Russell M. Nelson of the Quorum of the Twelve Apostles delivered a general conference address entitled "Thus Shall My Church Be Called."

Elder Nelson said to "note carefully" the language of the Lord in Doctrine and Covenants 115:4:

"He did not say, 'Thus shall my church be *named*.' He said, 'Thus shall my church be *called*.' Years ago, its members were cautioned by the Brethren who wrote: 'We feel that some may be misled by the too frequent use of the term 'Mormon Church' " (*Member-Missionary Class—Instructor's Guide*, Salt Lake City: The Church of Jesus Christ of Latter-day Saints, 1982, p. 2). "Before any other name is considered to be a legitimate substitute, the thoughtful person might reverently consider the feelings of the Heavenly Parent who bestowed that name."

Elder Nelson then examined the key words in the name of the Church — *saints, Latter-day, Jesus Christ* and *The Church* — offering insights into their sacred significance.

Members of Christ's Church are "privileged to participate" in its divine destiny, he concluded. "May we so honor Him who declared, 'Thus shall my church be *called* ... The Church of Jesus Christ of Latter-day Saints.' "

More recently, then-Elder M. Russell Ballard of the Quorum of the Twelve Apostles also encouraged Latter-day Saints to make clear the name by which the Lord Himself chose for His Church.

The Church of Jesus Christ of Latter-day Saints "is the name by which the Lord will call us at the last day. It is the name by which His Church will be distinguished from all others."

The name the Savior has given to His Church "tells us exactly who we are and what we believe," he said.

“We believe that Jesus Christ is the Savior and the Redeemer of the world. He atoned for all who would repent of their sins, and He broke the bands of death and provided the resurrection from the dead. We follow Jesus Christ. And as King Benjamin said to his people, so I reaffirm to all of us today: ‘Ye should remember to retain [His] name written always in your hearts’ ” (Mosiah 5:12).

One of President Nelson’s prophetic predecessors, President George Albert Smith, spoke in his 1948 October general conference of the divine significance of the name of the restored Church of Jesus Christ:

“Brethren and sisters, when you go away from here, you may be associating with various denominations of the world, but remember that there is only one Church in all the world that by divine command bears the name of Jesus Christ, our Lord.”

EXHIBIT F

Topic

Style Guide — The Name of the Church

The official name of the Church is The Church of Jesus Christ of Latter-day Saints. The full name was given by revelation from God to Joseph Smith in 1838.

- In the first reference, the full name of the Church is preferred: “The Church of Jesus Christ of Latter-day Saints.”
- When a shortened reference is needed, the terms “the Church” or the “Church of Jesus Christ” are encouraged. The “restored Church of Jesus Christ” is also accurate and encouraged.
- While the term “Mormon Church” has long been publicly applied to the Church as a nickname, it is not an authorized title, and the Church discourages its use. Thus, please avoid using the abbreviation “LDS” or the nickname “Mormon” as substitutes for the name of the Church, as in “Mormon Church,” “LDS Church,” or “Church of the Latter-day Saints.”
- When referring to Church members, the terms “members of The Church of Jesus Christ of Latter-day Saints,” “Latter-day Saints,” “members of the Church of Jesus Christ” and “members of the restored Church of Jesus Christ” are preferred. We ask that the term “Mormons” and “LDS” not be used.
- “Mormon” is correctly used in proper names such as the Book of Mormon or when used as an adjective in such historical expressions as “Mormon Trail.”
- The term “Mormonism” is inaccurate and should not be used. When describing the combination of doctrine, culture and lifestyle unique to

The Church of Jesus Christ of Latter-day Saints, the term “the restored gospel of Jesus Christ” is accurate and preferred.

- When referring to people or organizations that practice polygamy, it should be stated that The Church of Jesus Christ of Latter-day Saints is not affiliated with polygamous groups.

STYLE GUIDE NOTE: When reporting about The Church of Jesus Christ of Latter-day Saints, please use the complete name of the Church in the first reference. For more information on the use of the name of the Church, go to our online [Style Guide](#) .

EXHIBIT G

The Correct Name of the Church

By President Russell M. Nelson

President of the Church

Jesus Christ directed us to call the Church by His name because it is His Church, filled with His power.

My beloved brothers and sisters, on this beautiful Sabbath day we rejoice together in our many blessings from the Lord. We are very grateful for your testimonies of the restored gospel of Jesus Christ, for the sacrifices you've made to stay on or return to His covenant path, and for your consecrated service in His Church.

Today I feel compelled to discuss with you a matter of great importance. Some weeks ago, I released a statement regarding a course correction for the name of the Church.¹ I did this because the Lord impressed upon my mind the importance of the name He decreed for His Church, even The Church of Jesus Christ of Latter-day Saints.²

As you would expect, responses to this statement and to the revised style guide³ have been mixed. Many members immediately corrected the name of the Church on their blogs and social media pages. Others wondered why, with all that's going on in the world, it was necessary to emphasize something so "inconsequential." And some said it couldn't be done, so why even try? Let me explain why we care so deeply about this issue. But first let me state what this effort is *not*:

- It is *not* a name change.
- It is *not* rebranding.
- It is *not* cosmetic.
- It is *not* a whim.
- And it is *not* inconsequential.

Instead, it *is* a correction. It *is* the command of the Lord. Joseph Smith did not name the Church restored through him; neither did Mormon. It was the Savior Himself who said, "For thus shall my church be called in the last days, even The Church of Jesus Christ of Latter-day Saints."⁴

Even earlier, in AD 34, our resurrected Lord gave similar instruction to members of His Church when He visited them in the Americas. At that time He said:

"Ye shall call the church in my name. ...

“And how be it my church save it be called in my name? For if a church be called in Moses’ name then it be Moses’ church; or if it be called in the name of a man then it be the church of a man; but if it be called in my name then it is my church.”⁵

Thus, the name of the Church is not negotiable. When the Savior clearly states what the name of His Church should be and even precedes His declaration with, “Thus shall my church be called,” He is serious. And if we allow nicknames to be used or adopt or even sponsor those nicknames ourselves, He is offended.

What’s in a name or, in this case, a nickname? When it comes to nicknames of the Church, such as the “LDS Church,” the “Mormon Church,” or the “Church of the Latter-day Saints,” the most important thing *in* those names is the *absence* of the Savior’s name. To remove the Lord’s name from the Lord’s Church is a major victory for Satan. When we *discard* the Savior’s name, we are subtly *disregarding* all that Jesus Christ did for us—even His Atonement.

Consider this from His perspective: Premortally, He was Jehovah, God of the Old Testament. Under the direction of His Father, He was the Creator of this and other worlds.⁶ He chose to submit to the will of His Father and do something for all of God’s children that no one else could do! Condescending to come to earth as the Only Begotten of the Father in the flesh, He was brutally reviled, mocked, spit upon, and scourged. In the Garden of Gethsemane, our Savior took upon Himself *every* pain, *every* sin, and *all* of the anguish and suffering *ever* experienced by you and me and by everyone who has ever lived or will ever live. Under the weight of that excruciating burden, He bled from every pore.⁷ All of this suffering was intensified as He was cruelly crucified on Calvary’s cross.

Through these excruciating experiences and His subsequent Resurrection—His infinite Atonement—He granted immortality to all and ransomed each one of us from the effects of sin on condition of our repentance.

Following the Savior’s Resurrection and the death of His Apostles, the world plunged into centuries of darkness. Then in the year 1820, God the Father and His Son, Jesus Christ, appeared to the Prophet Joseph Smith to initiate the Restoration of the Lord’s Church.

After all He had endured—and after all He had done for humankind—I realize with profound regret that we have unwittingly acquiesced in the Lord’s restored Church being called by other names, each of which expunges the sacred name of Jesus Christ!

Every Sunday as we worthily partake of the sacrament, we make anew our sacred promise to our Heavenly Father that we are willing to take upon us the name of His Son, Jesus Christ.⁸ We promise to follow Him, repent, keep His commandments, and *always* remember Him.

When we omit His name from His Church, we are inadvertently removing *Him* as the central focus of our lives.

Taking the Savior’s name upon us includes declaring and witnessing to others—through our actions and our words—that Jesus is the Christ. Have we been so afraid to *offend* someone who called us “Mormons” that we have failed to *defend* the Savior Himself, to stand up for Him even in the name by which His Church is called?

If we as a people and as individuals are to have access to the power of the Atonement of Jesus Christ—to cleanse and heal us, to strengthen and magnify us, and ultimately to exalt us—we must clearly acknowledge Him as the source of that power. We can begin by calling His Church by the name He decreed.

For much of the world, the Lord’s Church is presently disguised as the “Mormon Church.” But we as members of the Lord’s Church know who stands at its head: Jesus Christ Himself. Unfortunately, many who hear the term *Mormon* may think that we worship Mormon. Not so! We honor and respect that great ancient American prophet.⁹ But we are *not* Mormon’s disciples. We are the Lord’s disciples.

In the early days of the restored Church, terms such as *Mormon Church* and *Mormons*¹⁰ were often used as epithets—as cruel terms, abusive terms—designed to obliterate God’s hand in restoring the Church of Jesus Christ in these latter days.¹¹

Brothers and sisters, there are many worldly arguments against restoring the correct name of the Church. Because of the digital world in which we live and with search engine optimization that helps all of us find information we need almost instantly—including information about the Lord’s Church—critics say that a correction at this point is unwise. Others feel that because we are known so widely as “Mormons” and as the “Mormon Church,” we should make the best of it.

If this were a discussion about branding a man-made organization, those arguments might prevail. But in this crucial matter, we look to Him whose Church this is and acknowledge that the Lord’s ways are not, and never will be, man’s ways. If we will be patient and if we will do our part well, the Lord will lead us through this important task. After all, we know that the Lord helps those who seek to do His will, just as He helped Nephi accomplish the task of building a ship to cross the sea.¹²

We will want to be courteous and patient in our efforts to correct these errors. Responsible media will be sympathetic in responding to our request.

In a previous general conference, Elder Benjamín De Hoyos spoke of such an event. He said:

“Some years ago while serving in the office of public affairs of the Church in Mexico, [a companion and I] were invited to participate in a radio talk show. ... [One of the program directors] asked [us], ‘Why does the Church have such a long name? ...’

“My companion and I smiled at such a magnificent question and then proceeded to explain that the name of the Church was not chosen by man. It was given by the Savior. ... The program director immediately and respectfully responded, ‘We will thus repeat it with great pleasure.’”¹³

That report provides a pattern. One by one, our best efforts as individuals will be required to correct errors that have crept in through the years.¹⁴ The rest of the world may or may not follow our lead in calling us by the correct name. But it is disingenuous for us to be frustrated if most of the world calls the Church and its members by the wrong names if we do the same.

Our revised style guide is helpful. It states: “In the first reference, the full name of the Church is preferred: ‘The Church of Jesus Christ of Latter-day Saints.’ When a shortened [second]

reference is needed, the terms ‘the Church’ or the ‘Church of Jesus Christ’ are encouraged. The ‘restored Church of Jesus Christ’ is also accurate and encouraged.”¹⁵

If someone should ask, “Are you a Mormon?” you could reply, “If you are asking if I am a member of The Church of Jesus Christ of Latter-day Saints, yes, I am!”

If someone asks, “Are you a Latter-day Saint?”¹⁶ you might respond, “Yes, I am. I believe in Jesus Christ and am a member of His restored Church.”

My dear brothers and sisters, I promise you that if we will do our best to restore the correct name of the Lord’s Church, He whose Church this is will pour down His power and blessings upon the heads of the Latter-day Saints,¹⁷ the likes of which we have never seen. We will have the knowledge and power of God to help us take the blessings of the restored gospel of Jesus Christ to every nation, kindred, tongue, and people and to prepare the world for the Second Coming of the Lord.

So, what’s in a name? When it comes to the name of the Lord’s Church, the answer is “Everything!” Jesus Christ directed us to call the Church by His name because it is His Church, filled with His power.

I know that God lives. Jesus is the Christ. He leads His Church today. I so testify in the sacred name of Jesus Christ, amen.

Notes

1. “The Lord has impressed upon my mind the importance of the name He has revealed for His Church, even The Church of Jesus Christ of Latter-day Saints. We have work before us to bring ourselves in harmony with His will. In recent weeks, various Church leaders and departments have initiated the necessary steps to do so. Additional information about this important matter will be made available in the coming months” (Russell M. Nelson, in “The Name of the Church” [official statement, Aug. 16, 2018], mormonnewsroom.org).
2. Preceding Presidents of the Church have made similar requests. For example, President George Albert Smith said: “Don’t let the Lord down by calling this the Mormon Church. He didn’t call it the Mormon Church” (in Conference Report, Apr. 1948, 160).
3. See “Style Guide—The Name of the Church,” newsroom.churchofjesuschrist.org.
4. Doctrine and Covenants 115:4.
5. 3 Nephi 27:7–8.
6. See Moses 1:33.
7. See Doctrine and Covenants 19:18.
8. See Moroni 4:3; Doctrine and Covenants 20:37, 77.

9. Mormon was one of the four major writers of the Book of Mormon, the others being Nephi, Jacob, and Moroni. All were eyewitnesses of the Lord, as was its inspired translator, the Prophet Joseph Smith.
10. Even the word *Mormonites* was among terms of derision that were employed (see *History of the Church*, 2:62–63, 126).
11. Other epithets seem to have occurred in New Testament times. During the Apostle Paul’s trial before Felix, Paul was said to be “a ringleader of the sect of the Nazarenes” (Acts 24:5). Regarding the use of the phrase “of the Nazarenes,” one commentator wrote: “This was the name usually given to Christians by way of contempt. They were so called because Jesus was of Nazareth” (Albert Barnes, *Notes, Explanatory and Practical, on the Acts of the Apostles* [1937], 313).

Similarly, another commentary states: “As our Lord was contemptuously called ‘The Nazarene’ (Matt. xxvi. 71), so the Jews designated his disciples ‘Nazarenes.’ They would not admit that they were Christians, *i.e.* disciples of the Messiah” (*The Pulpit Commentary: The Acts of the Apostles*, ed. H. D. M. Spence and Joseph S. Exell [1884], 2:231).

In a related vein, Elder Neal A. Maxwell observed: “Throughout scriptural history, we see recurring efforts to demean prophets in order to dismiss them—to label them in order to diminish them. Mostly, however, they are simply ignored by their contemporaries and by secular history. After all, early Christians were merely called ‘the sect of the Nazarenes.’ (Acts 24:5.)” (“Out of Obscurity,” *Ensign*, Nov. 1984, 10).
12. See 1 Nephi 18:1–2.
13. Benjamín De Hoyos, “Called to Be Saints,” *Ensign* or *Liahona*, May 2011, 106.
14. While we have no control over what other people may call us, we are in complete control over how we refer to ourselves. How can we expect others to honor the correct name of the Church if we as its members fail to do so?
15. “Style Guide—The Name of the Church,” newsroom.churchofjesuschrist.org.
16. The term *saint* is used often in the Holy Bible. In Paul’s Epistle to the Ephesians, for example, he used the word *saint* at least once in every chapter. A saint is a person who believes in Jesus Christ and strives to follow Him.
17. See Doctrine and Covenants 121:33.

EXHIBIT H



LDS Church Disavows “Mormon”-ism

Holly Welker (<https://politicalresearch.org/people/holly-welker>)

Published on August 20, 2018 Last Updated August 20, 2018



On August 16, The Church of Jesus Christ of Latter-day Saints announced (<https://www.mormonnewsroom.org/article/name-of-the-church>)—again—that it wants everyone to stop using the word *Mormon*. A style guide

(<https://www.mormonnewsroom.org/style-guide>)—posted on its website mormonnewsroom.org (<http://mormonnewsroom.org>)—explains that the full name of the church (capital T on *The*, hyphen between *Latter* and *day*, which has a lower-case *d*) should be used on first reference.

Since it's impractical to use all those words every single time you might want to refer to the church headquartered at 50 North Temple in Salt Lake City, Utah, what's approved for subsequent references? The abbreviation LDS is out, so “LDS church” is now verboten. Instead, “‘The Church’ or the ‘Church of Jesus Christ’ are encouraged. The ‘restored Church of Jesus Christ’ is also accurate and encouraged.”

Mormon, however, is “a nickname... not an authorized title” and is unacceptable for anything but proper names, like the Book of Mormon (and, presumably, the Mormon Tabernacle Choir) or “such historical expressions as the Mormon Trail.”

The newsroom announcement quotes President Russell M. Nelson: “The Lord has impressed upon my mind the importance of the name He has revealed for His Church, even The Church of Jesus Christ of Latter-day Saints.”

Taking that statement at face value and leaving aside the question of why the Lord didn't come up with a name that wouldn't cause the leaders of his church such headaches, there's the undeniable fact that all past efforts to get people, both in and out of The Church, to stop using the term *Mormon* for the church and its members have failed.

For instance, a 1982 instruction manual lamented, “We feel that some may be misled by the too frequent use of the term ‘Mormon Church.’”

I was in college at the time and extremely active at the LDS Institute of Religion; I remember that Latter-day Saints were indeed asked not to refer to ourselves as Mormons. But it was just so habitual, convenient, and catchy! There was even a skit performed at a church activity, riffing on a Dr Pepper ad (<https://www.youtube.com/watch?v=jvCTaccEkMI>) of the day:

I'm a Mormon

He's a Mormon

She's a Mormon

We're all Mormons

Wouldn't you like to be a Mormon too?

Be a Mormon, read the Book of Mormon!

I doubt that Latter-day Saints are any more likely in 2018 to renounce a practice ingrained over lifetimes than they were in 1982. I also doubt that reputable news sources will start referring to The Church of Jesus Christ of Latter-day Saints as the “restored gospel of Jesus Christ,” or that the scholarly field of Mormon Studies (Claremont College, for instance, has an endowed chair and a program in Mormon Studies (<https://mormonstudies.cgu.edu/>)) will get a name change anytime soon.

But this attempt to control how people refer to the COJCOLDS is more remarkable given that just a few years ago the COJCOLDS embraced the term Mormon—recall its I'm a Mormon (<https://www.mormon.org/people>) campaign still available at mormon.org—and went so far as to claim it was a brand (<http://live-religion-dispatches.pantheonsite.io/lds-church-asserts-trademark-of-mormon/>), suing people who used the word in businesses. Will it still find grounds for suing people who try to use the term now?

The most recent statement concludes, “In the coming months, Church websites and materials will be updated to reflect this direction from President Nelson.” However, those updates might be hampered by the church's failure to plan ahead and secure domain names that don't involve the word Mormon.

While ldsnewsroom.org redirects to mormonnewsroom.org, latterdaysaintnewsroom.org (<http://latterdaysaintnewsroom.org>) and several other relevant domain names—latterdaysaintnewsroom.com, thechurchofjesuschristoflatterdaysaintsnewsroom.com, and thechurchofjesuschristoflatterdaysaintsnewsroom.org—have been nabbed by the church’s critics (who can’t properly be called anti-Mormon since the church itself is now officially anti-Mormon).

Restoredchurchofjesuschrist.org (<http://Restoredchurchofjesuschrist.org>) says that it’s “under construction, but Ldsnewsroom.com was still available as of this writing.

Authors

Holly Welker
(<https://politicalresearch.org/people/holly-welker>)

Holly Welker is the editor of Baring Witness: 36 Mormon Women Talk Candidly about Love, Sex, and Marriage. Her poetry and prose have appeared in publications ranging from Seventeen to Dialogue: A Journal of Mormon Thought to Bitch to the New York Times.

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EXHIBIT I

CHURCH OF JESUS CHRIST FAITH

President Nelson asked President Ballard to help correct church's name. Here's how he led the Twelve

Published: Nov 16, 2023, 8:50 p.m. MST



See More Deseret News Stories In Search

**By Tad Walch**

Tad Walch covers religion with a focus on The Church of Jesus Christ of Latter-day Saints.

This article was first published in the [ChurchBeat newsletter](#). Sign up to receive the newsletter in your inbox each Wednesday night.

President Russell M. Nelson began to emphasize the correct, full name of The Church of Jesus Christ of Latter-day Saints nearly three decades before he became its president.

Eight months after he was ordained the church's prophet and president, he announced in August 2018 the church no longer would use the terms "LDS" or "Mormon," unless related to the Book of Mormon or other proper nouns.



President M. Russell Ballard and President Russell M. Nelson of The Church of Jesus Christ of Latter-day Saints react in the Rome Italy Temple lobby to a photograph taken of them and their apostolic colleagues with the Christus and statues of the other ancient apostles at the temple's visitors' center on Monday, March 11, 2019. | Jeffrey D. Allred, Deseret News PURCHASE IMAGE

President Nelson set the tone and the course for a correction with that announcement and his general conference talk two months later. “The name of the church is not negotiable,” he said, because Christ himself had revealed it. “For much of the world, the Lord’s Church is presently disguised as the ‘Mormon Church.’”

“When we omit his name from his Church, we are inadvertently removing *him* as the central focus of our lives,” he said.

How would the church correct its name across the world?

As President Nelson said a year later in another general conference talk, he assigned President M. Russell Ballard, acting president of the Quorum of the Twelve Apostles, to lead the entire quorum to institutionalize the correction. President Ballard died Sunday at age 95 and his funeral is Friday.

President Nelson said in his new book, “Heart of the Matter,” that he and President Ballard took a short trip together in May 2018, when the two of them “discussed the realities of the dilemma at length.”

“After returning home and discussing this matter further with my counselors, we determined it was time to tackle the issue,” President Nelson wrote. “I subsequently sent a letter to President Ballard, giving the Quorum of the Twelve the charge to resolve this dilemma.”

Here’s a look at how President Ballard fulfilled this assignment.

Both leaders had spoken in previous conferences about the importance of the Savior’s name within the church’s name. President Nelson spoke about it in 1990 and President Ballard in 2011, long before they became the presidents of the church and quorum, respectively.

President Ballard noted that an effort had been made to emphasize Christ’s name by using the full church name after the 2002 Olympics, but it didn’t stick.

This time would be different.

There were three overwhelming signals that the church was serious about making a long-lasting correction. The first was related to the church's official website, then known as LDS.org.

How did the Church of Jesus Christ change the name of its website?

Church leaders had wanted to purchase the rights to use the internet domain name ChurchofJesusChrist.org since 2006. The church's Intellectual Property Office constantly monitored its availability. Leaders likewise had sought the domain name ChurchofJesusChrist.com since 2011.

"Neither was for sale," Elder Neil L. Andersen once said.

Suddenly, not long before President Nelson's announcement, ChurchofJesusChrist.org was offered for sale. The church purchased it for "a very modest amount," Elder Andersen said.

Then ChurchofJesusChrist.com became available the month President Nelson announced the name correction, and the church scooped it up, too.

"It was a miracle," Elder Andersen declared.

Then the real work began. The church made the costly, exhaustive move of migrating all of its content from LDS.org to ChurchofJesusChrist.org.

President Ballard and the quorum also oversaw the correction of adding the Savior's name to the email addresses of 33,000 leaders and employees. Now every person at church headquarters has an email address that ends with @ChurchofJesusChrist.org.

They also updated 300 web-based apps and acquired 800 domain names in the United States and around the world for use of the full church name.

In one year, 95% of the church's outward-facing references were updated, Elder Gerrit W. Gong of the Quorum of the Twelve Apostles said at the time.

Changing the church's biggest name brands

The second signal the church was intent on carrying out President Nelson's vision was changing the name of one of the church's biggest international brands.

The Mormon Tabernacle Choir willingly surrendered its name. Today it is known proudly as the Tabernacle Choir at Temple Square.

LDS Business College became Ensign College. Mormon.org was redirected into ChurchofJesusChrist.org.

In all, over 1,000 products that had the name "Mormon" or "LDS" attached were renamed, Elder Andersen reported.

Adding an image of Christ to the church's symbol

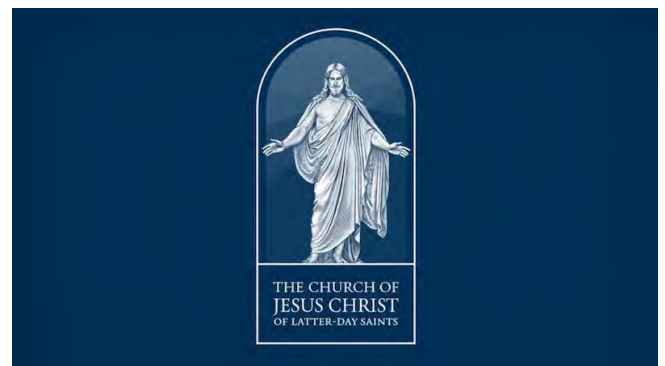
The third and final stroke was changing the church's symbol, or logo.

President Nelson said he again enlisted President Ballard and the Quorum of the Twelve to oversee further emphasizing Christ at the center of the symbol representing the church. When President Nelson unveiled it to the church, he said:

"The center of the symbol is a representation of Thorvaldsen's marble statue, the Christus. Jesus stands under an arch as a reminder of his emergence from the tomb three days after his death. It portrays the resurrected, *living* Lord reaching out to embrace all who will come unto him."

The name Jesus Christ again is printed larger than all the other words in the church's name.

The world has taken note. Leaders of other religions, humanitarian officials, politicians, many journalists and others now regularly use the church's full name, sometimes with a hiccup here or there. Some still decline, but the change is remarkable.



"They're clearly serious about it," Al Tompkins, who teaches journalism and ethics at the Poynter Institute in St. Petersburg,

Florida, told me a year after President Nelson's announcement. "It's not a marketing campaign."

"Hats off to them," Tompkins said. "They're getting double-entendre use out of the full name. They want to spread the name of Jesus Christ, and they know every time you say their name now, you're going to say his."

President Nelson himself called the huge undertaking an extraordinary one.

"We have gone to these extraordinary efforts because when we remove the Lord's name from the name of his church, we inadvertently remove *him* as the central focus of our worship and our lives," he said.

In "Heart of the Matter," he praised President Ballard and the Twelve for their work.

"I am pleased to say that the Quorum of the Twelve Apostles, under President Ballard's superb leadership, handled this exceptionally difficult assignment with wisdom and inspiration," President Nelson wrote.

President Ballard said the correction would clarify the church's messaging to the world.

"As this goes forward, it will become more and more evident in our literature, in our messaging, in anything where the church is connected, that we are The Church of Jesus Christ of Latter-day Saints," President Ballard said. "It is part of the message of the ongoing restoration of the fulness of the gospel of Jesus Christ."

My recent stories

[Funeral service announced for President M. Russell Ballard](#) (Nov. 14)

[How President M. Russell Ballard was a link from the church's humble founding to its global emergence](#) (Nov. 11)

[Giving Machines to be placed in record numbers across the globe this holiday season](#) (Nov. 10)

[Heber Valley Utah Temple approved. See why the church agreed to dim the lighting](#) (Nov. 9)

About the church

The Okinawa Japan Temple was dedicated by Elder Gary E. Stevenson on Sunday. See a photo gallery here.

President Nelson shared a post about his recovery from an injury to his back muscles.

The church is supporting the nourishment of mothers and children around the globe.

Please read my story above about President Ballard after his death Sunday. The link to how to watch or attend his funeral is also listed there. Read or watch or listen to more about him at the following links:

- Video: 'A Loving Tribute' to President M. Russell Ballard.
- Highlights of President Ballard's teachings and testimony in 2023.
- 16 times President Ballard quoted poems, speeches and literary works in devotionals and general conference.
- A look back on President Ballard's teachings on effective councils.
- Church News Podcast, Episode 162: President M. Russell Ballard, 1928 — 2023: Celebrating his life in his own words.
- The co-author of a biography of President Ballard, "Anxiously Engaged," reflected on his life. Susan Easton Black shared a story about a time President Ballard's watch broke while he was in Thailand. Some who were with him bargained with a woman at a market for a replacement. They told him what the lower price was. "He said to the young woman, 'How much were you originally asking for the watch?' And when she indicated it, he said, 'that's the price I would like to pay,'" Black said.

What I'm reading

An Arizona judge granted the church's motion for summary judgment and dismissed a negligence complaint against the church related to child sex abuse committed by the late Paul Adams. The ruling turned on the priest-penitent privilege.

It's the "largest private economic investment in (Utah) history," according to Gov. Spencer Cox. Texas Instruments broke ground earlier this month on an \$11 billion expansion of its microchip fabrication plant based in Lehi.

The smile on this girl's face while she dodges other players during a flag football game is priceless.

Why church member Taysom Hill's jersey is in the football Hall of Fame.

Texas A&M fired its football coach. But it owes him \$76 million. Not a great way for the athletic department to spend its money, in my opinion. This writer shows you what else you could buy with all that cash.

Behind the scenes



President M. Russell Ballard of The Church of Jesus Christ of Latter-day Saints, and Elder Quentin L. Cook laugh with Cardinal Timothy M. Dolan at St. Patrick's Cathedral in New York City on Sunday, Mar. 12, 2023. Elder David L. Buckner is on the far left. President Ballard was renowned for the bridges he built to other faiths throughout his ministry. | Jeffrey D. Allred, Deseret News



ChurchBeat with Tad Walch

Go behind the scenes on what's happening with The Church of Jesus Christ of Latter-day Saints and its members.

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EXHIBIT J

5 October 2018 - SALT LAKE CITY | News Release

World-renowned Mormon Tabernacle Choir Changes Its Name

After more than 100 years, the world-renowned Mormon Tabernacle Choir is changing its name to “**The Tabernacle Choir at Temple Square.**” The name modification, which drops the long-standing word “Mormon,” follows an **August 2018 statement** by President Russell M. Nelson requesting the use of the full name of The Church of Jesus Christ of Latter-day Saints, the choir’s sponsoring organization.



“A new name for the Tabernacle Choir will represent a change after so many years,” said Ron Jarrett, president of the choir. “The name may change, but everything that people know and love about the choir will not only be the same but will get better and better.”

To coincide with the choir's new name, its website address will be changed to thetabernaclechoir.org and its Facebook and YouTube pages can now be found at facebook.com/thetabernaclechoir and youtube.com/TheTabernacleChoiratTempleSquare. The choir can also be found on Twitter at twitter.com/@thetabchoir.

Jarrett said, "We have always been a forward-looking people, and we are focused on what is not changing: the world-class musicianship, the inspiring arrangements and programming, and our weekly 'Music and the Spoken Word' broadcast, continuing a tradition begun 90 years ago."

The Tabernacle Choir's new name preserves the heritage of its home in the historic **Tabernacle** at Temple Square in Salt Lake City. Since 1867, choir members have sung in the Tabernacle, a building known for its one-of-a-kind signature sound.

The historic Tabernacle was built during a time with no amplifiers or electronics and was designed so all attendees could hear the speaker's voice from any seat in the hall. In fact, the Tabernacle building is still used as a recording studio for the choir today.

Launched in 1929, the landmark "Music and the Spoken Word" program is now in its 90th year of weekly broadcasts, making it the longest-running continuous network broadcast in history. The nondenominational program features musical selections by the choir and Orchestra at Temple Square, accompanied by the Tabernacle organ, with a short inspirational message.

Music director Mack Wilberg said the program's audience continues to grow: "Among the many reasons 'Music and the Spoken Word' continues to be relevant worldwide is it conveys hope, joy, and comfort through inspirational music and messages. [In] each broadcast, the choir and orchestra stand on the shoulders of the many who came before them to bring audiences the highest quality of music and inspiration."

The first airing of “Music and the Spoken Word” on July 15, 1929, was makeshift at best. That summer day, a local radio crew ran a wire from its control room to an amplifier in the Tabernacle nearly a block away. The technicians put the station’s sole microphone on a ladder not only to capture the music of the choir, but also so an announcer could introduce each number. Nineteen-year-old Ted Kimball — son of the Tabernacle organist and the designated announcer — perched on the ladder for the duration of the program so those listening could hear his words.

Today the choir’s weekly broadcast is carried on radio, television and cable networks across the United States and around the world. The choir’s music is also available live on its YouTube channel.

“Music and the Spoken Word” has been inducted into the National Association of Broadcasters Hall of Fame and the National Radio Hall of Fame.

Additional Resources

STYLE GUIDE NOTE: When reporting about The Church of Jesus Christ of Latter-day Saints, please use the complete name of the Church in the first reference. For more information on the use of the name of the Church, go to our online [Style Guide](#) .

EXHIBIT K



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The Salt Lake Tribune

In major speech, LDS President Dallin Oaks says he wants to help all members ‘overcome present or future doubts’

At BYU devotional, he warns about the danger of “speculation and false information” in podcasts and on social media.



(Bethany Baker | The Salt Lake Tribune) President Dallin H. Oaks speaks in his first public address as president of The Church of Jesus Christ of Latter-day Saints during the BYU devotional in Provo on Tuesday, Feb. 10, 2026.

By  Dylan Eubank | Feb. 10, 2026, 11:53 a.m. | Updated: Feb. 11, 2026, 10:07 a.m.

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Provo • In his first major address as president of The Church of Jesus Christ of Latter-day Saints, Dallin H. Oaks urged members across the globe Tuesday to draw closer to

Christ to help them overcome any doubts they have about their faith.

“You live in a season where the adversary has become so effective at disguising truth that if you don’t have the Holy Ghost, you will be deceived,” he warned in a devotional at a packed Marriott Center at Brigham Young University. “Many obstacles lie ahead. The distractions will be many. Even active members may sometimes have concerns about some historical, doctrinal or social issues connected with the church.”

The 93-year-old Oaks, a former BYU president, thanked the multitudes of members who have prayed for him as he [took the helm](#) of the 17.5 million-member church in October.



This “mantle” of prophet, Oaks said, settled in soon after the Sept. 27 death of his immediate predecessor, [President Russell M. Nelson](#), as did the full weight of his new position.

“Within a few minutes after learning of our president’s death,” he said, “I felt the heaviness of responsibility settle upon me, along with important impressions of what I was required to do *now*.”

One of Oaks’ goals, he said, is to “help all our members overcome present or future doubts” about the church. The way for them to do so, he added, was to:

- Strengthen their faith in Jesus.



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- Increase their humility.
- Seek help from other believers.
- Practice patience.

Beware of social media, podcasts



(Bethany Baker | The Salt Lake Tribune) President Dallin H. Oaks speaks in his first public address as president of The Church of Jesus Christ of Latter-day Saints during the BYU devotional in Provo on Tuesday, Feb. 10, 2026.





Oaks cautioned about the danger of “speculation and false information” in podcasts and on social media. He said some individuals protest or question church doctrines without fully understanding them.

“Don’t be persuaded by false or inaccurate information,” Oaks advised. “Discuss your concerns with faithful well-informed friends, and always take those concerns to the Lord.”

Oaks also encouraged Latter-day Saints to remain humble, a “master virtue,” he said, that will enable them to grow “closer to Jesus Christ.”

A former Utah Supreme Court justice, he shared a story from his time as a first year professor at [The University of Chicago Law School](#).

A well-known faculty member had died and Oaks was asked to teach his classes until a substitute teacher could be provided.

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Oaks fulfilled this assignment — despite the classes being on a legal subject with which he was unfamiliar — and congratulated himself on completing the task. Afterward, one of his students approached Oaks and offered what he expected would be a compliment.

“Mr. Oaks,” the student said, “I was in that class you taught for Professor So-and-So, and I must tell you I was really impressed. You will make a good teacher, *some day*.”

This sentiment humbled Oaks. “I was overly confident in my abilities as a teacher,” he conceded, “and that student provided a perspective that has blessed me to this day.”

This story was especially impactful to BYU student Kyra Sauter, one of more than 18,000 people in attendance at the Marriott Center, who said humility is a virtue she wants to acquire.

“Since he’s become prophet, I’ve seen President Oaks just grow so much in his love for the church,” Sauter said. “I liked a lot of what he said about humility. I think I could use a lot of the words that he said, because I am one of the least humble people I know.”

A pitch for marriage and children



(Bethany Baker | The Salt Lake Tribune) President Dallin H. Oaks looks to the crowd after his first public address as president of The Church of Jesus Christ of Latter-day Saints during the BYU devotional in Provo on Tuesday, Feb. 10, 2026.

The church's 18th president, who was joined by wife Kristen at the devotional, said "those of diminishing faith and activity in the restored church are a major source of concern" to the faith's top leaders.

"The Lord loves all of his children and longs for their return, but we all know examples of returned missionaries who have interrupted their spiritual growth by periods of inactivity," he said. "We know of youth who have jeopardized their spiritual growth by separating themselves from church teaching, such as those who are expressing little desire to be married or have children."

In [one of his two interviews](#) since rising to church president and in [previous sermons](#), Oaks has raised concerns about young members delaying marriage and childbearing.

Last month, for instance, he voiced hope that lowering the minimum missionary age for young women [from 19 to 18](#) would "reduce the age of marriage" for Latter-day Saint couples.

Part of God's plan, he said then, is to "overcome the tendency of waiting until the late 20s" to marry.

And in a [worldwide devotional in 2023](#), Oaks declared that "marriage is central to the purpose of mortal [and eternal] life," along with the "commandment to multiply and replenish the Earth."

In Tuesday's address, however, Oaks instead shifted his focus to the company that members keep.

"Seek friends and associates who are striving to follow the Lord, with whom you can feel the Spirit and reinforce your faith," he said. "Surround yourself with people who believe."

Faith Lee, a BYU student from St. George, said she especially connected with this sentiment.

“He talked a lot about surrounding yourselves around people with the same faith and people who will uplift you,” Lee said. “It hit me hard because when I was in high school, I didn’t have those kinds of friends. And so it was like a personal message to me.”



(Bethany Baker | The Salt Lake Tribune) A choir sings during the BYU devotional from President Dallin H. Oaks, his first public address as president of The Church of Jesus Christ of Latter-day Saints, in Provo on Tuesday, Feb. 10, 2026.

BYU student Katelyn Bodine said Oaks’ message gave her hope for the future — despite challenging personal circumstances.

“I feel very uplifted,” Bodine said, “It’s easy to get bogged down, and I think it was a nice feeling just having President Oaks reiterate, ‘You need to have faith in Christ, you need to be patient, you need to be humble.’ It gives me hope that life will get better.”

The church president pointed out that all people are in different places on their spiritual journeys.

“We need to be patient with one another and, occasionally, even with ourselves,” Oaks said. “Overcoming doubt — resolving conflicts between the evolving understanding of science and the sometimes-incomplete teachings of religion — can be a lengthy process, like building faith or acquiring humility.”

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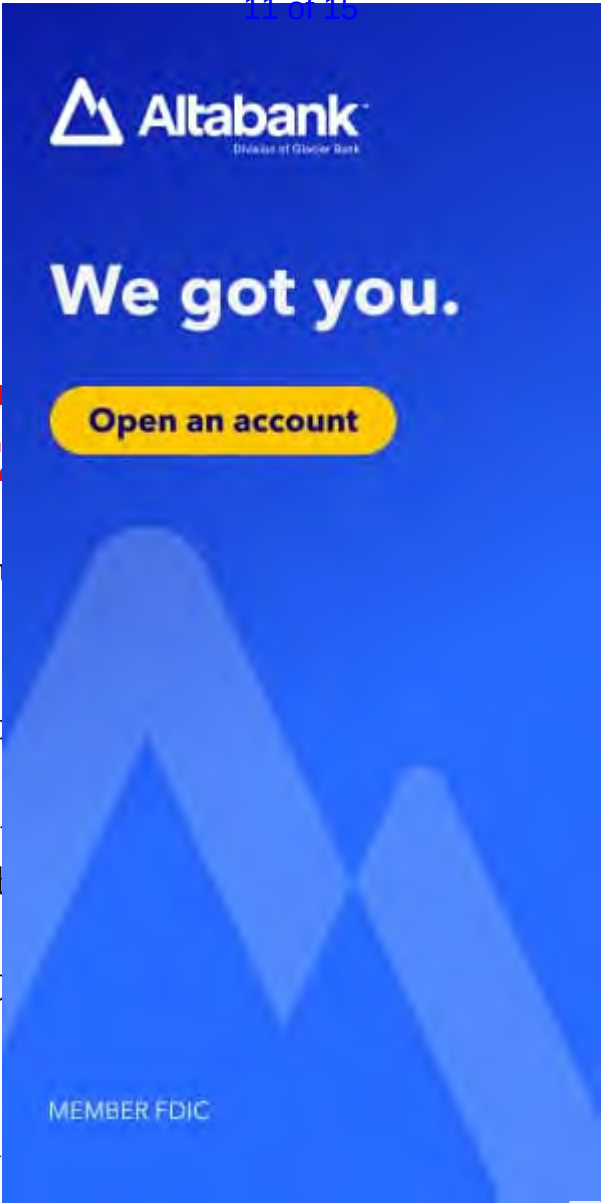
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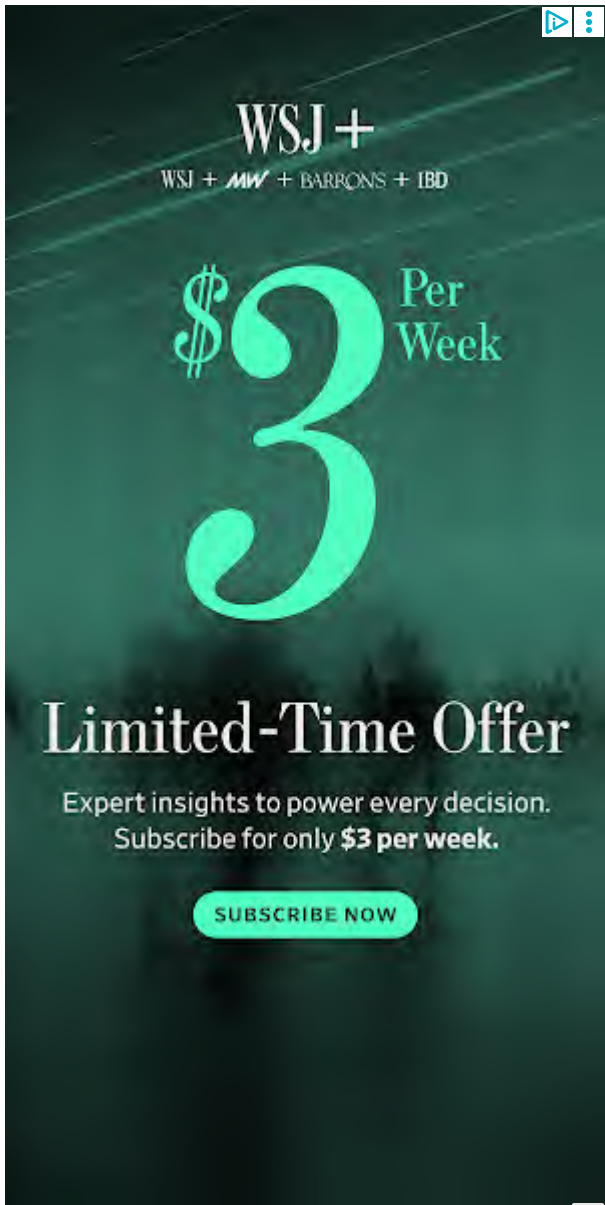
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