

ESTTA Tracking number: **ESTTA687253**

Filing date: **08/03/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91212540
Party	Plaintiff Glory Yau-Huai Tsai
Correspondence Address	GLORY YAU-HUAI TSAI 1512 MAPLEGROVE ST WEST COVINA, CA 91792 UNITED STATES gloryhouse@glorynews.net, glory_tsai@verizon.net
Submission	Testimony For Plaintiff
Filer's Name	GLORY YAU-HUAI TSAI
Filer's e-mail	glory_tsai@verizon.net, gloryhouse@glorynews.net
Signature	/GLORY YAU-HUAI TSAI/
Date	08/03/2015
Attachments	Exhibits11-21-offered by Plaintiff-Opposition 91212540.pdf(4496452 bytes) Exhibit-22,TO-defendant-Sent on July 28, 2015.pdf(1388328 bytes) Testimony-Plaintiff-Glory Yau-Huai Tsai-Opposition #91212540.pdf(2996839 bytes)

Exhibit-11 is a true copy of Opposer
Glory Yau-Huai Tsai's "GLORY HOUSE" business Seller's
Permit which was issued in August 1975.

1975 was forty years ago. Now, it is 2015.

In the early 1970s, there were no high dpi copy machines.
This copy is the true copy I found in my old documents.

I could not find the original.

GLORY YAU-HUAI TSAI
Sole owner of the trademark GLORY HOUSE®

Vs.

BJK Glory House Catering Co., LLC
Jo Ann Goin, Owner of
BJK Glory House Catering Co., LLC

Opposition No. **91212540**

Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

CALIFORNIA STATE BOARD OF EQUALIZATION
Seller's Permit

ACCOUNT NUMBER
SR AP 13-675766

8-75

Glory House
Glory Yau Tsai
750 E. Garvey Ave. Suite E
Monterey Park, California 91754

THIS PERMIT DOES NOT AUTHORIZE THE HOLDER TO ENGAGE IN ANY BUSINESS CONTRARY TO LAWS REGULATING THAT BUSINESS OR TO POSSESS OR OPERATE ANY ILLEGAL DEVICE.

IS HEREBY AUTHORIZED PURSUANT TO SALES AND USE TAX LAW TO ENGAGE IN THE BUSINESS OF SELLING TANGIBLE PERSONAL PROPERTY AT THE ABOVE LOCATION

STATE BOARD OF EQUALIZATION

THIS PERMIT IS VALID UNTIL REVOKED OR CANCELLED BUT IS NOT TRANSFERABLE
Not valid at any other address

BT-442-R REV. 6 (8-71) 13

DISPLAY CONSPICUOUSLY AT THE PLACE OF BUSINESS FOR WHICH ISSUED

Exhibit-11

GLORY YAU-HUAI TSAI vs. BJK Glory House Catering Co., LLC
Opposition No. **91212540**
Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

Exhibit-12 is a true copy of a membership book cover.
It was one of Glory Yau-Huai Tsai's "GLORY HOUSE" printing service products in **1978**.

These printed products clearly show Glory Yau-Huai Tsai's business name "GLORY HOUSE" and Glory Yau-Huai Tsai's "GLORY HOUSE" mark.

中美金齡會

CHINESE-AMERICAN GOLDEN AGE ASSOCIATION

c/o Dr. Frances Wu
524 N. Lincoln Ave. #F
Monterey Park, CA 91754
(213) 573-0370

MEMBERSHIP ROSTER

會員名單

1978 -1979



Printed by

GLORY HOUSE

PUBLISHING & PRINTING

5640 Shull St. Suite "Q" Bell Gardens, CA 90201
P.O. BOX 242 Monterey Park, CA 91754
U. S. A.

TEL: (213) 927-3141

Exhibit-13 is a true copy of a concert event program (Cover Page) which I, Glory Yau-Huai Tsai printed and donated to **“Suzuki Music Association of California/Los Angeles Branch”** in **1993**.

These printed concert event programs clearly show Glory Yau-Huai Tsai’s “GLORY HOUSE” business name and Glory Yau-Huai Tsai’s “GLORY HOUSE” mark.

They also show Glory Yau-Huai Tsai’s short name **“GLORY TSAI.”**

You Are A Wonderful Teacher,
Ms. Lorraine Fink
Thank You Very Much.

We Love You!
Sakura and Aki Tsai



中美印書館
TM SINCE 1975

Trademark Reg. No. 59068 & 092375

BOOKS PUBLISHING & PRINTING

1416 & 1420 E. Cypress St., Covina 91724

(818)339-8955

Toll free Tel: **(800)GO(46)-GLORY(45679)** - (within California)

Toll free Tel: Nationwide:

(800)52-GLORY, (800)55-GLORY

(800)OK(65)-GLORY(45679), (800)85-GLORY

Publisher's Prefix Number: 1-880709

Manufacturer's UPC I.D. Number 7 25698

Books Publishing, Photo-Typesetting

Layout & Graphic Design

Fast ★ Accurate ★ Reliable

Announcements ☆ Books ☆ Brochures ☆ Business Stationery
Flyers ☆ Manuals ☆ Menus ☆ Newsletters ☆ Price Books
Posters ☆ Programs

The
GLORY Edition

SM SINCE 1975 Reg. No. 037399

GLORY TSAI

Showcase '93

April 25, 1993

4:00 p. m.

Whittier College Chapel

Whittier, California



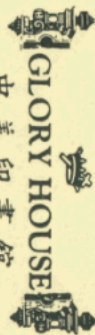
Sponsored by

Suzuki Music Association of California/Los Angeles Branch

Exhibit-14 is a true copy of a concert event program (Cover Page) which I, Glory Yau-Huai Tsai printed and donated to **“Suzuki Music Association of California/Los Angeles Branch”** in 1994.

These printed concert event programs clearly show Glory Yau-Huai Tsai’s “GLORY HOUSE” business name and Glory Yau-Huai Tsai’s “GLORY HOUSE” mark.

They also show Glory Yau-Huai Tsai’s short name **“GLORY TSAI.”**



Trademark Reg. No. 590668 & 092375
BOOKS PUBLISHING & PRINTING
 1416 & 1420 E. Cypress St., Covina 91724
(818)339-8955

Toll free Tel: Nationwide:
(800)52-GLORY, (800)55-GLORY
(800)OK(65)-GLORY(45679), (800)85-GLORY
 Publisher's Prefix Number: 1-880709
 Manufacturer's UPC I.D. Number 7 25698

*Books Publishing, Photo-Typesetting
 Layout & Graphic Design*

Fast ★ Accurate ★ Reliable

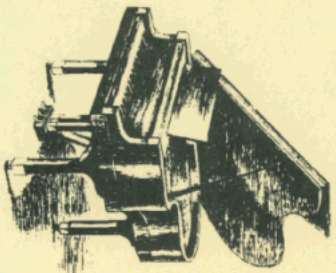
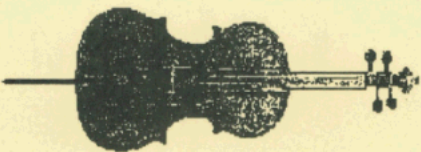
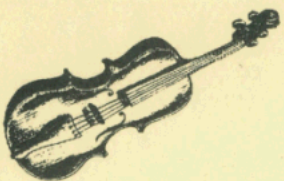
Announcements ☆ Books ☆ Brochures ☆ Business Stationery
 Flyers ☆ Manuals ☆ Menus ☆ Newsletters ☆ Price Books
 Posters ☆ Programs

The **GLORY Edition**
 SM SINCE 1975 Reg. No. 037399
GLORY TSAI

Festival 1994

February 6, 1994
 2:15 p.m. and 4:00 p.m.

Norman J. Partiz Concert Hall
 Alexander Hamilton High School
 Academy of Music
 Los Angeles, California



Sponsored by

Suzuki Music Association of California/Los Angeles Branch

Exhibit-15 is a true copy of a screenshot of “Whois” report from **www.networksolutions.com**.

This “Whois” report clearly show “VistaPrint Technologies, Ltd” as the registrant of **www.gloryhouseproductions.com**.

WHOIS Results for gloryhouseproductions.com

Available domain names similar to gloryhouseproductions.com

Available Extensions

- gloryhouseproductions.net
- gloryhouseproductions.tel
- gloryhouseproductions.org
- gloryhouseproductions.us

Available Domains

- glory-house-productions.com
- gloryhomeproductions.com
- glory-home-productions.com
- gloryhouseproductionsz.com

Premium Resale Domains

- productionshark.com \$1,895
- productionservicesonline.com \$688
- californiahouserental.com \$1,449
- wentworthhouse.com \$388

[View more](#)

Add Selected to Cart

gloryhouseproductions.com

Is this your domain name? [Renew it now.](#)



BOOKMARK

Current Registrar: TUCOWS INC.
 IP Address: [89.20.21.12](#) (ARIN & RIPE IP search)
 Lock Status: clientTransferProhibited

Registrant:
 VistaPrint Technologies Ltd
 Canon's Court
 22 Victoria Street
 Hamilton, N0L2
 BC

Domain name: GLOUHOUSEPRODUCTIONS.COM

Administrative Contact:
 Administrator, Domain csadmin@vistaprint.com
 89 Hayden Avenue
 Lexington, MA 02421
 US
 +1.781.852.8199 Fax: +1.781.852.8096

Technical Contact:
 Administrator, Domain csadmin@vistaprint.com
 89 Hayden Ave.
 Lexington, MA 02421
 US
 +1.781.852.8199 Fax: +1.781.852.8096

Registration Service Provider:
 Vistaprint, csadmin@vistaprint.com
 888-811-1674

Registrar of Record: TUCOWS, INC.
 Record last updated on 30-Aug-2010.
 Record expires on 28-Aug-2011.
 Record created on 28-Aug-2010.

Registrar Domain Name Help Center:
<http://tucowdomains.com>

Domain servers in listed order:
 NS4.VPWEB.COM
 NS3.VPWEB.COM
 NS2.VPWEB.COM



WOULD \$10,000 CHANGE YOUR LIFE?

Tell us how .com changed your life and you could win \$10,000. [Howdoyou.com >>](#)

Make an instant, anonymous offer to the current domain registrant. [Learn More](#)

Make Offer

Search Again

Search again here...

Search by either

Domain Name e.g. networksolutions.com

IP Address e.g. 209.178.187.13

Search



Exhibit-16 is a true copy of the print out of “Whois” report from **www.networksolutions.com**.

This “Whois” report clearly show “**VistaPrint Technologies,Ltd**” as the registrant of **www.gloryhouseproductions.com**.

gloryhouseproductions.com

Is this your domain name? [Renew it now.](#)



Current Registrar: TUCOWS INC.

IP Address: [89.20.93.12](#) (ARIN & RIPE IP search)

Lock Status: clientTransferProhibited

Registrant:

VistaPrint Technologies Ltd
Canon's Court
22 Victoria Street
Hamilton, HM12
BM

Domain name: GLORYHOUSEPRODUCTIONS.COM

Administrative Contact:

Administrator, Domain csadmin@vistaprint.com
95 Hayden Avenue
Lexington, MA 02421
US
+1.7816526199 Fax: +1.7816526096

Technical Contact:

Administrator, Domain csadmin@vistaprint.com
95 Hayden Ave.
Lexington, MA 02421
US
+1.7816526199 Fax: +1.7816526096

Registration Service Provider:

Vistaprint, csadmin@vistaprint.com
866-811-1674

Registrar of Record: TUCOWS, INC.
Record last updated on 30-Aug-2010.
Record expires on 28-Aug-2011.
Record created on 28-Aug-2010.

Registrar Domain Name Help Center:

<http://tucowsdomains.com>

Domain servers in listed order:

NS4.VPWEB.COM
NS3.VPWEB.COM
NS2.VPWEB.COM

Domain status: clientTransferProhibited
clientUpdateProhibited

Exhibit-16

Page-12

GLORY YAU-HUAI TSAI

vs.

BJK Glory House Catering Co., LLC

Opposition No. 91212540

Exhibits offered by Plaintiff Glory Yau-Huai Tsai

Exhibit-17 is a screenshot of a web page “www.gloryhouseproductions.com” which show an address located at “**4100 The woods, San Jose, CA 95123**”.

In about August 2010 “**VistaPrint Technologies, Ltd**” and their associated groups **infringed Opposer Glory Yau-Huai Tsai’s Trademark name “GLORY HOUSE”**.

VistaPrint Technologies Ltd. together with their associated group on August 29, 2010 registered a domain name “www.gloryhouseproductions.com” using an address located at “**4100 The woods, San Jose, CA 95123**” which was shown on the www.gloryhouseproductions.com site to advertise and collect money from people.

Approximately one year later, VistaPrint Technologies, Ltd’s associated group “gloryhouseproductions.com” disappeared.

They disappeared and left all kinds of junk upon Opposer Glory Yau-Huai Tsai’s personal reputation and Plaintiff **Glory Yau-Huai Tsai’s “GLORY HOUSE”** business reputation.

“**VistaPrint Technologies Ltd.**” in some ways caused www.manta.com, “www.dandb.com”, and some other media websites **to switch** “gloryhouseproductions.com” to attach to Opposer Glory Yau-Huai Tsai’s “GLORY HOUSE” business.

www.manta.com, “www.dandb.com”, and some other media websites post false information claiming Opposer Glory Yau-Huai Tsai as **a principal of video, motion picture producer and distributor with malicious intent of driving** Opposer’s Glory Yau-Huai Tsai’s publishing and printing business out of the market, **to wipe out** Opposer Glory Yau-Huai Tsai’s GLORY HOUSE trademark ownership and **to switch** Oppose Glory Yau-Huai Tsai’s GLORY HOUSE trademark ownership **to some other people like Jo Ann Goin**, a person who claim **herself** as the owner of the trademark of GLORY HOUSE.



This is a true copy of a web page posted by gloryhouseproductions.com in 2010. This web page show an address “4100 The woods, San Jose, CA 95123” and telephone number (650) 771-7530, (800) 594-8813

GLORY YAU-HUAI TSAI vs. BJK Glory House Catering Co., LLC
Opposition No. **91212540**
Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

Exhibit – 17
Page-14

Exhibit-18 is a screenshot of a web page from www.manta.com. www.manta.com continuously posts false information on their website claiming that opposer Glory Yau-Huai Tsai's trademark GLORY HOUSE's publishing and printing business is a business that produces videos and motion pictures, and is an Urban Films Distributor.

These false information not only seriously damage Plaintiff Glory Yau-Huai Tsai's personal reputation but also damage Plaintiff Glory Yau-Huai Tsai's GLORY HOUSE publishing and printing business and mislead the public to not believe plaintiff GLORY YAU-HUAI TSAI's ownership of the trademark GLORY HOUSE® and Glory Yau-Huai Tsai's publishing and printing business.

In the public eye, it also causes the ownership of the trademark GLORY HOUSE to incorrectly and confusingly switch to a different person like defendant Jo Ann Goin and her BJK Glory House Catering, LLC.



Home

Glory House Productions

1512 E Maplegrove Street
West Covina, CA 91792 - [View Map](#)
Phone: (626) 917-6423

[Own This Business?](#)

Ads

[SAN for Video Editing](#) Shared Storage for Pro Workgroups For Avid, FCP, Premiere – See Price

www.studionetworksolutions.com/EVO

Glory House Productions

A privately held company in West Covina, CA. *Is this your business? [Claim This Profile](#)*

More Details for Glory House Productions

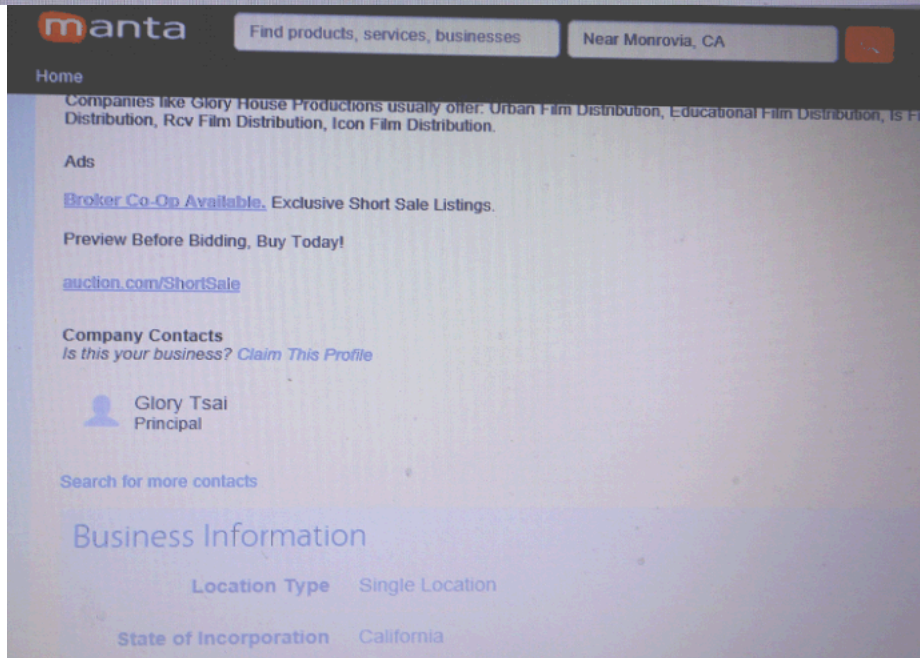
Categorized under Motion Picture and Tape Distributors. Our records show it was established in 2010 and incorporated in California. Current estimates show this company has an annual revenue of 110000 and employs a staff of approximately 2.

Products or Services

Companies like Glory House Productions usually offer: Urban Film Distribution, Educational Film Distribution, Is Film Distribution, Rcv Film Distribution, Icon Film Distribution.

Ads

[Death Records Online](#) Find Death, Cemetery, Obituary



GLORY YAU-HUAI TSAI vs. BJK Glory House Catering Co., LLC
Opposition No. **91212540**
Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

Exhibit-18
Page -16

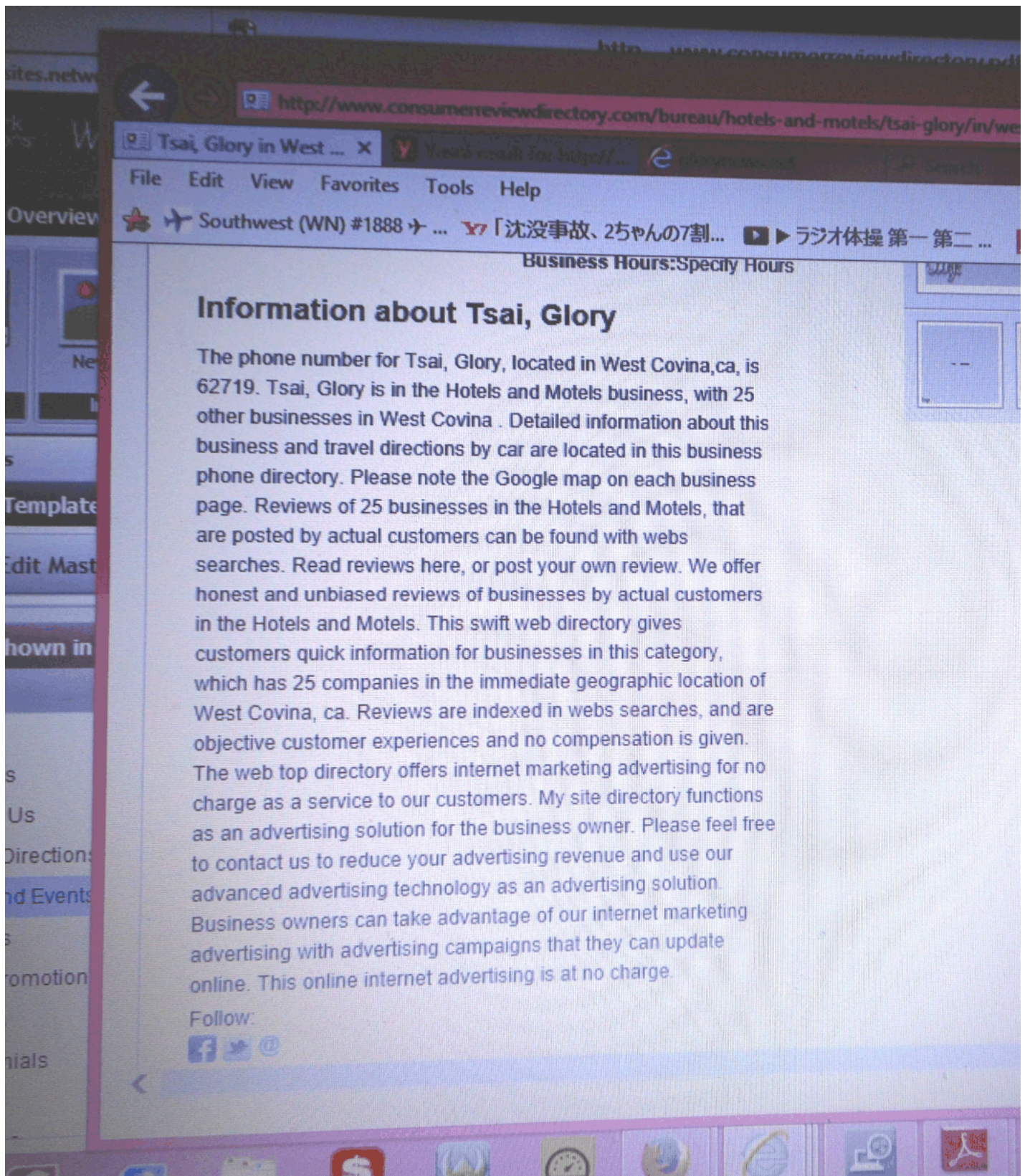
Exhibit-19 is a screenshot of a web page from www.consumerreviewdirectory.com

“www.consumerreviewdirectory.com” used opposer Glory Yau-Huai Tsai’s short name “Glory Tsai” to post and spread many ridiculous information on their website claiming Opposer Glory Yau-Huai Tsai (Glory Tsai) as a person who is in the Hotels and Motels business, with 25 other Businesses in West Covina.

Who is the owner behind www.consumereviewdirectory.com?

These false information not only seriously damage Plaintiff Glory Yau-Huai Tsai’s personal reputation but also damage Plaintiff Glory Yau-Huai Tsai’s GLORY HOUSE publishing and printing business and mislead the public to not believe plaintiff GLORY YAU-HUAI TSAI’s ownership of the trademark GLORY HOUSE® and Glory Yau-Huai Tsai’s publishing and printing business.

In the public eye, it also causes the ownership of the trademark GLORY HOUSE to incorrectly and confusingly switch to a different person like defendant Jo Ann Goin and her BJK Glory House Catering, LLC.



This is a screenshot of a web page from
www.consumerreviewdirectory.com

GLORY YAU-HUAI TSAI vs. BJK Glory House Catering Co., LLC
Opposition No. **91212540**
Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

Exhibit - 19
Page-18

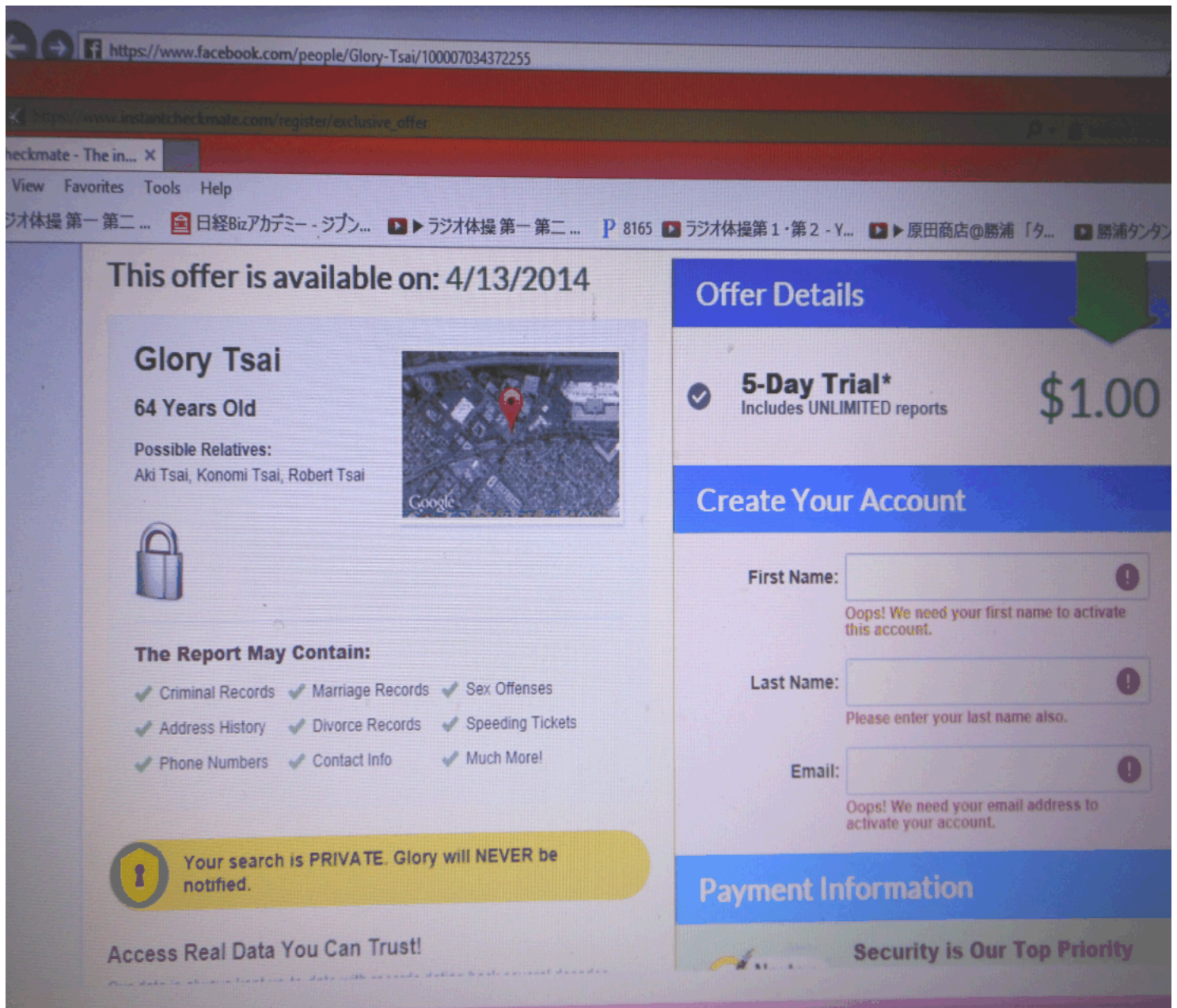
Exhibit-20 is a screenshot of a web page from
“**www.instantcheckmate.com**”

“**www.instantcheckmate.com**” not only sells Opposer
Glory Yau-Huai Tsai’s personal information, including date
of birth and other important information, but also sells
incorrect information under opposer Glory Yau-Huai Tsai’s
short name “Glory Tsai” for **\$1.00**.

www.instantcheckmate.com calls it “**Shock information**”

“**Shock! Shock! When you see it, you will be shocked**”.

“**www.instantcheckmate.com** and their group” has malicious
intent to damage Opposer Glory Yau-Huai Tsai’s personal identity
and announces to the world that Opposer Glory Yau-Huai Tsai’s
reputation is worth **\$1.00**.



“**www.instantcheckmate.com**” not only sells Opposer Glory Yau-Huai Tsai’s personal information including date of birth and SSN but also sells *incorrect* information under opposer Glory Yau-Huai Tsai’s short name “Glory Tsai” for **\$1.00**. **www.instantcheckmate.com** calls it “Shock information” “**Shock! Shock! When you see it, you will be shocked**”.

“www.instantcheckmate.com and their group” has malicious intent to damage Opposer Glory Yau-Huai Tsai’s personal identity and announces to the world that Opposer Glory Yau-Huai Tsai’s reputation is worth \$1.00.

GLORY YAU-HUAI TSAI vs. BJK Glory House Catering Co., LLC
Opposition No. **91212540**
Exhibits offered by **Plaintiff Glory Yau-Huai Tsai**

Exhibit-20
Page-20

Exhibit-21 is a true copy of a print out page from
“**www.dandb.com**”

Dun & Bradstreet Credibility Corp. continuously posts false information on their **www.dandb.com** website claiming that opposer Glory Yau-Huai Tsai’s trademark GLORY HOUSE’s publishing and printing business is a business that produces videos and motion pictures, and is an Urban Films Distributor.

Furthermore, “**Dun & Bradstreet Credibility Corp.**” claim that opposer Glory Yau-Huai Tsai’s trademark GLORY HOUSE’s business since 2010 provides Motion Picture and Tape Distribution from WEST COVINA and has an estimated annual revenue of \$110,000.00.

These false information not only seriously damage Plaintiff Glory Yau-Huai Tsai’s personal reputation but also seriously damage opposer Glory Yau-Huai Tsai’s business and mislead the public to not believe plaintiff Glory Yau-Huai Tsai’s’s ownership of the trademark “GLORY HOUSE®”.

In the public eye, it seriously causes Opposer Glory Yau-Huai Tsai’s business ownership of the trademark GLORY HOUSE to incorrectly and confusingly switch to a different person like defendant Jo Ann Goin and her BJK Glory House Catering, LLC.

Dun & Bradstreet
CREDIBILITY CORP



Credibility Review™

GLORY HOUSE PRODUCTIONS

Company Logo
not available.

Address & Location

1512 E Maplegrove St (626) 917-6423 main
West Covina, CA 91792-1214

Contact

Glory Tsai

Company Snapshot

Founded	2010
Incorporated	
Annual Revenue	\$ 110,000.00
Employee Count	2
Industries	

Company Summary

Since 2010, GLORY HOUSE PRODUCTIONS has been providing Motion Picture and Tape Distribution from WEST COVINA. GLORY HOUSE PRODUCTIONS has estimated annual revenues of \$ 110,000.00 and also employs an estimated 2 employees.

Company Description

This company currently does not have a description

Exhibit-22

**PLAINTIFF GLORY YAU-HUAI TSAI'S
REQUESTS FOR ANSWERING
THE QUESTIONS
TO APPLICANT JO ANN GOIN**

**This Exhibit-22 contain 7 pages plus
a page of exhibit: Exhibit-10**

**Exhibit-10 is an email which defendant Jo Ann Goin
sent to Opposer on December 18, 2012**

**This mail was sent on July 28, 2015
by certified mail “7003 1680 0000 7657 2350”
with a return receipt requested.**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<p>GLORY YAU-HUAI TSAI) Sole owner of the trademark GLORY HOUSE®) GLORY HOUSE® Registration Number 1879695) Opposer,) vs) BJK Glory House Catering Co., LLC) Jo Ann Goin, Owner of) BJK Glory House Catering Co., LLC) Applicant.)</p>	<p>Opposition No. 91212540 Service Mark Application Re: Serial No. 85-789420 Mark: GLORY HOUSE Filing Date: November 28, 2012</p>
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United States Patent and Trademark Office
The COMMISSIONER for TRADEMARKS
Attn: **Trademark Trial and Appeal Board**
P.O. Box 1451
Alexandria, Virginia 22313-1451

**PLAINTIFF GLORY YAU-HUAI TSAI'S REQUESTS FOR ANSWERING
THE QUESTIONS TO APPLICANT JO ANN GOIN**

Plaintiff Glory Yau-Huai Tsai's requests for answering the following questions caused by defendant's infringement and use of plaintiff's federally registered trademark name GLORY HOUSE.

Since 2008, Plaintiff Glory Yau-Huai Tsai had trouble receiving Plaintiff Glory Yau-Huai Tsai's emails from the server. It looked like somebody was screening Plaintiff Glory Yau-Huai Tsai's incoming and outgoing emails.

A few days ago, Plaintiff Glory Yau-Huai Tsai tried to clean Plaintiff Glory Yau-Huai Tsai's email box space; Plaintiff Glory Yau-Huai Tsai was surprised to see an email which defendant "Jo Ann Goin" sent to Plaintiff on December 18, 2012.

Plaintiff Glory Yau-Huai Tsai was surprised because this email was not shown in Plaintiff Glory Yau-Huai Tsai's inbox on December 18, 2012 or some following date.

1 Plaintiff Glory Yau-Huai Tsai was never aware of when and how this email came into
2 Plaintiff Glory Yau-Huai Tsai's email inbox. Attached herein is the copy of the email marked as
3 **exhibit-10.**

4
5 According to the allegation which Applicant (defendant) Jo Ann Goin stated in her email
6 to Opposer Glory Yau-Huai Tsai, obviously, defendant Jo Ann Goin not only denied Plaintiff
7 Glory Yau-Huai Tsai's ownership of the Plaintiff Glory Yau-Huai Tsai's federally registered
8 trademark "GLORY HOUSE" but also ignore Plaintiff Glory Yau-Huai Tsai's constitutional
9 rights of personal identity and opposer Glory Yau-Huai Tsai's almost four decades of publishing
10 and printing services.

11 Furthermore, applicant (defendant) Jo Ann Goin questioned against Plaintiff
12 Glory Yau-Huai Tsai, saying "**Please check with your trademark attorney and he or she will**
13 **explain it to you. Thanks.**"

14 Since "**Lisa R. Hemphill**" is the attorney and representative of Jo Ann Goin and BJK
15 Glory House Catering, LLC, Plaintiff, Opposer Glory Yau-Huai Tsai herein request Applicant to
16 give clear answers **under penalty of perjury** to the following questions:

17
18 **Question Number 1**

19 Is the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC the
20 owner(s) of the federally registered trademark of GLORY HOUSE?

21 **Answer:** "Yes" or "No"

22
23 **Question Number 2**

24 Does the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC own any state
25 trademark registration under the name "GLORY HOUSE" in any other states in the United
26 States of America? **Answer:** "Yes" or "No"

1 **Question Number 3**

2 Does the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC own any
3 trademark registration under the name "GLORY HOUSE" in any other country or countries in
4 the world?

5 **Answer:** "Yes" or "No"

6
7 **Question Number 4**

8 Did the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC contact
9 any person in the world as "the trademark owner of GLORY HOUSE"?

10 **Answer:** "Yes" or "No"

11
12 **Question Number 5**

13 Did the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC contact
14 any person in the world whose name is also called "Glory Tsai"?

15 **Answer:** "Yes" or "No"

16
17 **Question Number 6**

18 Did the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC spread
19 the rumor somewhere in the world stating that the person named "Glory Tsai" who resides in the
20 United States of America is a female?

21 **Answer:** "Yes" or "No"

22
23 **Question Number 7**

24 Does the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC have any
25 partner, associated agent, related company or licensee who operated the business under the name
26 "GLORY HOUSE" or similar sound of "GLORY HOUSE" on the new-year day of January 01,
27 2000? **Answer:** "Yes" or "No"

1 **Question Number 8**

2 Does the applicant (defendant) Jo Ann Goin or BJK Glory House Catering, LLC have
3 any partner, associated agent, related company or licensee who is operating the business under
4 the name of "GLORY HOUSE" or similar sound of "GLORY HOUSE" in the United States of
5 America?

6 **Answer:** "Yes" or "No"

7
8 **Question Number 9**

9 Did the applicant (defendant) Jo Ann Goin, using the name of "**the trademark owner of**
10 **GLORY HOUSE**" announce to the public, in the year, before or after 2011?

11 **Answer:** "Yes" or "No"

12
13 **Question Number 10**

14 In about 2011, plaintiff Glory Yau-Huai Tsai's GLORY HOUSE website pages
15 was suddenly taken down, disappeared and deleted by the hosting company. Did the applicant
16 (defendant) Jo Ann Goin, BJK Glory House Catering, LLC or any of Jo Ann Goin's
17 partner, associated agent, related company, licensee or defendant's web site design company,
18 hosting company use the name of the partner of the trademark owner of GLORY HOUSE to
19 cause plaintiff's web site hosting company confusingly or mistakenly take down Plaintiff Glory
20 Yau-Huai Tsai's federally registered trademark name "GLORY HOUSE" website?

21 **Answer:** "Yes" or "No"

22
23 **Question Number 11**

24 Does the applicant (defendant) Jo Ann Goin identify herself as the owner of the
25 registered trademark GLORY HOUSE?

26 **Answer:** "Yes" or "No"

1 **Question Number 12**

2 Does the applicant (defendant) Jo Ann Goin use her position as a chairwoman of Irving
3 Chamber of Commerce, TX to verify to the public that “GLORY HOUSE is a trademark of BJK
4 Glory House Catering Co., LLC.?”

5 **Answer:** “Yes” or “No”
6

7 **Question Number 13**

8 Does the applicant (defendant) Jo Ann Goin use her position as a chairwoman of Irving
9 Chamber of Commerce, TX to verify to the public and spread stories that the business of
10 “GLORY HOUSE” is a restaurant and catering service, but not the printing and publishing?

11 **Answer:** “Yes” or “No”
12

13 **Question Number 14**

14 Does the applicant (defendant) Jo Ann Goin use her position as a chairwoman of Irving
15 Chamber of Commerce, TX to verify to other people that the business type of GLORY HOUSE
16 is a restaurant and catering business only?

17 **Answer:** “Yes” or “No”
18

19 **Question Number 15**

20 Does the applicant (defendant) Jo Ann Goin, BJK Glory House Catering, LLC, any
21 partner, associated agent, related company, licensee or website design company of defendant Jo
22 Ann Goin and BJK Glory House Catering, LLC, **use the name of the trademark owner of**
23 **“GLORY HOUSE”** to contact any Google’s business advertising agent or sale person?

24 **Answer:** “Yes” or “No”
25
26
27
28

1 **Question Number 16**

2 Does the applicant (defendant) Jo Ann Goin, BJK Glory House Catering, LLC, any
3 partner, associated agent, related company or licensee or website design company of defendant
4 Jo Ann Goin and BJK Glory House Catering, LLC, **use the name of the owner of “GLORY
5 HOUSE”** to contact any printing business company?

6 **Answer:** “Yes” or “No”
7

8 **Question Number 17**

9 Does the applicant (defendant) Jo Ann Goin, BJK Glory House Catering, LLC, any
10 partner, associated agent, related company, licensee or website design company of defendant Jo
11 Ann Goin and BJK Glory House Catering, LLC, **use the name of the owner of “GLORY
12 HOUSE”** to contact a printing business company named “VistaPrint”?

13 **Answer:** “Yes” or “No”
14

15 **Question Number 18**

16 Does the applicant (defendant) Jo Ann Goin owner of BJK Glory House Catering, LLC
17 identify herself as the owner of the trademark GLORY HOUSE to any printing business
18 Company? **Answer:** “Yes” or “No”
19

20 **Question Number 19**

21 What is the name of the printing company who provides the printing services for
22 applicant Jo Ann Goin and Jo Ann Goin’s restaurant business? **Response:**
23

24 **Question Number 20**

25 The names of all Asian persons who work or financially interest relative to Jo Ann Goin,
26 Jo Ann Goin’s BJK Glory House Catering, LLC. or Jo Ann Goin’s business?

27 **Response:**
28

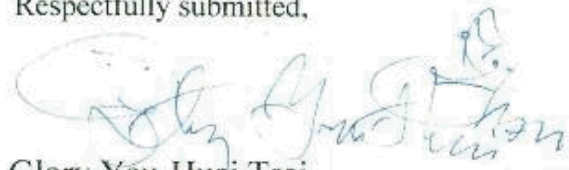
1 **Question Number 21**

2 When and why did Jo Ann Goin's restaurant and catering business change its name to
3 "BJK Glory House Catering, LLC?"

4 **Response:**

5
6 Dated: July 28, 2015

Respectfully submitted,



7
8 **Glory Yau-Huai Tsai**

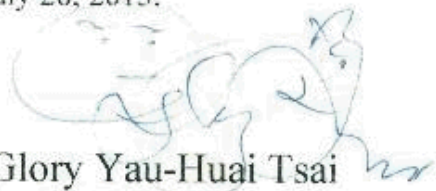
9 Opposer in pro per
10 **GLORY HOUSE®**

11 (626) 917-0657, (800) OK-GLORY, (626) 917-6423
12 www.glorynews.net, www.okglory.com
13 1512 E. MAPLEGROVE ST.
14 WEST COVINA, CALIFORNIA 91792

15 **CERTIFICATE OF SERVICE**

16 I, Glory Yau-Huai Tsai hereby certify that true and correct copies of the foregoing
17 "PLAINTIFF GLORY YAU-HUAI TSAI'S REQUESTS FOR ANSWERING THE
18 QUESTIONS TO APPLICANT JO ANN GOIN"

19 along with the **Exhibit-10** (a true copy of an email which defendant Jo Ann Goin sent to
20 Plaintiff on December 18, 2012) attached thereto were served via certified mail
21 (7003 1680 0000 7657 2350) with return receipt requested, postage fully prepaid upon
22 applicant's attorney **Lisa R. Hemphill** Gardere Wynne Sewel, L.L.P. 3000 Thanksgiving Tower,
23 1601 Elm Street Dallas, Texas 75201 on July 28, 2015.



24 **Glory Yau-Huai Tsai**

25 Opposer in pro per

26 **GLORY HOUSE®**

27 (626) 917-0657, (800) OK-GLORY
28 www.glorynews.net, www.okglory.com
1512 E. MAPLEGROVE ST.
WEST COVINA, CALIFORNIA 91792

GLORY TSAI

From: "Jo Ann Goin" <joann@gloryhousecatering.com>
To: "GoodNews-GLORY HOUSE" <goodnews@glorynews.net>
Sent: Tuesday, December 18, 2012 2:58 PM
Subject: Re: Are you the owner of GLORY HOUSE Trademark?

Please check with your trademark attorney and he or she will explain it to you. Thanks.

Jo Ann Goin

(972) 259-1123

109 S Main Street, Irving, TX 75060

[Click here for our daily Bistro Menu](#)

GLORY HOUSE

catering receptions bistro

[Glory House Catering Receptions & Bistro Website](#)

[Click Here For a Virtual Tour of Glory House!](#)

My profiles:  

Want a signature like mine? [Click here.](#)

On Tue, Dec 18, 2012 at 2:10 AM, GoodNews-GLORY HOUSE <goodnews@glorynews.net> wrote:

December 17, 2012

TO: Jo Ann Goin

joann@gloryhousecatering.com

BJK Glory House Catering Co., LLC.

According to the web pages that your company posted on the internet and Google, you repeatedly allege that "GLORY HOUSE is a trademark of Glory House Catering."

Could you send us more details about your trademark registration number?

Thank You.

GLORY HOUSE

goodnews@glorynews.net

GLORY YAU-HUAI TSAI

vs.

BJK Glory House Catering Co., LLC

Opposition No. 91212540

Exhibits offer by Plaintiff

Exhibit-10

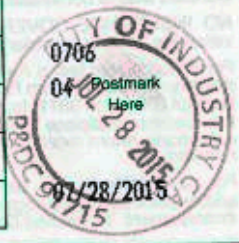
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 Street, Apt. No., or PO Box No. 1601 Elm Street, Suite 3000
 City, State, ZIP+4 Dallas, TX 75201-4761

PS Form 3800, June 2002 See Reverse for Instructions

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Return Receipt		\$2.80
Label #:		
9590952106150063317570		

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Bill #: 1000703492131
 Clerk: 04

1 **IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**
 2 **BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

3	GLORY YAU-HUAI TSAI)	
4	Sole owner of the trademark GLORY HOUSE®)	
	GLORY HOUSE® Registration Number 1879695)	Opposition No. 91212540
5	Opposer,)	
	vs)	Service Mark Application
6)	Re: Serial No. 85-789420
7	BJK Glory House Catering Co., LLC)	Mark: GLORY HOUSE
	Jo Ann Goin, Owner of)	Filing Date: November 28, 2012
8	BJK Glory House Catering Co., LLC)	
	Applicant.)	

9

10 United States Patent and Trademark Office
 11 The COMMISSIONER for TRADEMARKS
 12 Attn: **Trademark Trial and Appeal Board**
 13 P.O. Box 1451
 Alexandria, Virginia 22313-1451

14

15 **TESTIMONY AND DEPOSITION EXECUTED BY**
 16 **PLAINTIFF GLORY YAU-HUAI TSAI**

17

18 **In this deposition Process, Plaintiff Glory Yau-Huai Tsai consulted a**
 19 **lawyer to help with the Trial Process of this case but Plaintiff Glory Yau-Huai**
 20 **Tsai received a disappointing answer.**

21 **Plaintiff Glory Yau-Huai Tsai now submits his testimony together with the**
 22 **exhibits which Plaintiff was expecting to offer in the deposition process.**

23 Plaintiff Glory Yau-Huai Tsai prays that the Honorable Trademark Judges could
 24 kindly examine all the Exhibits which Plaintiff Glory Yau-Huai Tsai submitted.

25 These evidences are **truths** which Plaintiff Glory Yau-Huai Tsai and Plaintiff Glory
 26 Yau-Huai Tsai’s family are currently facing. It is a cause of big headaches.

1 I, Glory Yau-Huai Tsai declare

2
3 1. I, GLORY YAU-HUAI TSAI (full name) am a person 65 years of age.

4 2. I am capable to declare under penalty of perjury that the following statements are
5 true to my own knowledge and belief.

6 3. I, Glory Yau-Huai Tsai am the person who started and established the business
7 named "**GLORY HOUSE**" forty years (40 years) ago in July 1975.

8 4. July 1975 was the month I, Glory Yau-Huai Tsai set up the printing facility.

9 5. Attached herein Exhibit-11 is a true copy of "GLORY HOUSE" business
10 Seller's Permit which was issued in August 1975.

11 6. I, Glory Yau-Huai Tsai conduct the publishing, printing and printed paper
12 products business.

13 7. My (Glory Yau-Huai Tsai's) family is a Christian family and has been for more
14 than three generations. More than seventy years ago, My (Plaintiff Glory Yau-Huai Tsai's)
15 grandparents donated to and established Christian churches in Taiwan in many different
16 locations under the Presbyterian Church System.

17 8. I, Glory Yau-Huai Tsai, personally believe there is one "Creator" who creates
18 Heaven and earth and all of our human kinds. Our human being calls "Creator" in many
19 different languages, in many different sounds. In English, the word "God" is used.

20 9. I, Glory Yau-Huai Tsai, believe "God" watches all human being behaviors.
21 "God" sees through our minds. "God" has his righteous judgments upon us.

22 10. Attached herein, Exhibit-12 is a true copy of a membership book cover. It was
23 one of Glory Yau-Huai Tsai's "GLORY HOUSE" printing service products in **1978**. These
24 printed products clearly show Glory Yau-Huai Tsai's "GLORY HOUSE" business name and
25 Glory Yau-Huai Tsai's "GLORY HOUSE" mark.

26 11. Attached herein, Exhibit-13 is a true copy of a concert event program which I,
27 Glory Yau-Huai Tsai printed and donated to "**Suzuki Music Association of California/Los**
28 **Angeles Branch**" in **1993**.

1 All these printed concert event programs clearly show Glory Yau-Huai Tsai's
2 "GLORY HOUSE" business name and Glory Yau-Huai Tsai's "GLORY HOUSE" mark.
3 They also show Glory Yau-Huai Tsai's short name "GLORY TSAI."

4 12. Attached herein, **Exhibit-14**, is a true copy of a concert event program which
5 Glory Yau-Huai Tsai printed and donated to "Suzuki Music Association of California/Los
6 Angeles Branch" in 1994. All these printed concert event programs clearly show Glory Yau-
7 Huai Tsai's "GLORY HOUSE" business name and Glory Yau-Huai Tsai's "GLORY
8 HOUSE" mark. They also show Glory Yau-Huai Tsai's short name "GLORY TSAI"

9
10 13. In this case, **Opposition #91212540**, it looks as if there is one defendant, Jo
11 Ann Goin and her BJK Glory House Catering, LLC. However, many different parties seem to
12 be involved behind defendant Jo Ann Goin and her intention to willfully infringe plaintiff
13 Glory Yau-Huai Tsai's business and trademark name "GLORY HOUSE."

14 If called for deposition, then many parties will be involved.

15 14. I, Glory Yau-Huai Tsai, consulted an attorney. When the attorney gave me his
16 name card I was surprised because on the backside of his business card was a printed name
17 "VistaPrint". In another words, the attorney either got free or paid an inexpensive price for
18 business cards from "VistaPrint."

19 15. Because "VistaPrint" is one party who defamed against Opposer Glory Yau-
20 Huai Tsai's personal and business reputation, the attorney did not want to handle this case
21 against those parties who has business relations.

22 16. Another attorney's monetary amount which the attorney requested exceeds
23 Opposer Glory Yau-Huai Tsai's financial capability at this time.

24 17. **All these exhibits which I, Glory Yau-Huai Tsai submit here proves that serious**
25 **confusion amongst society against Opposer Glory Yau-Huai Tsai and Opposer Glory**
26 **Yau-Huai Tsai's GLORY HOUSE business occurred as a result of those who stole and**

1 **falsely represented Opposer Glory Yau-Huai Tsai's personal identity and Opposer Glory**
2 **Yau-Huai Tsai's trademark business name GLORY HOUSE**

3
4 17. All these exhibits which I, Glory Yau-Huai Tsai submit here proves that
5 serious confusion amongst society against Opposer Glory Yau-Huai Tsai and Opposer
6 Glory Yau-Huai Tsai's GLORY HOUSE business occurred as a result of those who stole
7 and falsely represented Opposer Glory Yau-Huai Tsai's personal identity and Opposer
8 Glory Yau-Huai Tsai's trademark business name GLORY HOUSE.

9 18. Opposer Glory Yau-Huai Tsai's personal reputation and Opposer's GLORY
10 HOUSE® publishing and printing business are attacked and defamed by many different media
11 websites. Those media website claim Opposer Glory Yau-Huai Tsai's business to be a hotel
12 and motel business, a business that produces videos and motion pictures, and is an Urban
13 Films Distributor.

14 19. Opposer Glory Yau-Huai Tsai believe that those who use these kinds of media
15 websites to attack and defame Opposer Glory Yau-Huai Tsai have one purpose to cause
16 Opposer's financial loss and wipe out Opposer Glory Yau-Huai Tsai's GLORY HOUSE
17 business.

18 20. Opposer Glory Yau-Huai Tsai has sufficient reason to believe that **those parties**
19 **have financial interest with** defendant Jo Ann Goin and Jo Ann Goin's businesses.

20 21. One website, "**www.manta.com**" (**exhibit-18**) continuously posts false
21 information on their website claiming opposer Glory Yau-Huai Tsai's trademark GLORY
22 HOUSE's publishing and printing business is a business that produces videos and motion
23 pictures and is an Urban Films Distributor.

24 22. Attached herein an **exhibit-18** is a screenshot of web pages from
25 **www.manta.com.**

26 23. In fact, the business called "**gloryhouseproductions.com**" **was created by a**
27 **printing business company "VistaPrint Technologies, Ltd."**

1 24. Attached **Exhibit-15** is a true copy of a screenshot of “Whois” reports from
2 www.networksolutions.com.

3 25. Attached **Exhibit-16** is a true copy of the print out of “Whois” reports from
4 www.networksolutions.com.

5 26. These reports, **Exhibit-15 and Exhibit-16** are from
6 www.networksolutions.com which clearly show “VistaPrint Technologies, Ltd” as the
7 registrant of www.gloryhouseproductions.com.

8 27. In about August 2010 “VistaPrint Technologies, Ltd” and their associated
9 groups **infringed Opposer Glory Yau-Huai Tsai’s Trademark name “GLORY HOUSE”**.
10 **VistaPrint Technologies Ltd.** together with their associated group on August 29, 2010
11 registered a domain name “www.gloryhouseproductions.com” using an address located at
12 “**4100 The woods, San Jose, CA 95123**” which was shown on the
13 www.gloryhouseproductions.com site to advertise and collect money from people.

14 28. Attached **Exhibit-17** is a screenshot of a web page
15 “www.gloryhouseproductions.com” which show the address located at “**4100 The woods,**
16 **San Jose, CA 95123**”.

17 29. Approximately one year later, VistaPrint Technologies, Ltd’s associated group
18 “www.gloryhouseproductions.com” disappeared.

19 30. VistaPrint Technologies Ltd. in some ways caused “www.manta.com”,
20 “www.dandb.com”, and other media websites to **post** on their website claiming **the business**
21 **of “gloryhouseproductions.com”** belongs to Opposer Glory Yau-Huai Tsai’s “GLORY
22 HOUSE” business and that Opposer’s GLORY HOUSE business is a business that produces
23 videos and motion pictures and is an Urban Films Distributor.

24 31. “VistaPrint Technologies Ltd.,” “www.manta.com,” “www.dandb.com”,
25 **dumped all kinds of junk** from gloryhouseproduction.com to Opposer
26 www.gloryhouseproductions.com and Opposer’s GLORY HOUSE business.

1 32. In the meantime, defendant Jo Ann Goin infringed Opposer Glory Yau-
2 Huai Tsai's trademark name "GLORY HOUSE®" and changed her restaurant's name
3 to "BJK Glory House Catering, LLC."

4 33. Jo Ann Goin used her position as a chairwoman of Chamber of Commerce of
5 Irving County, Texas to verify that she is the trademark owner of GLORY HOUSE and
6 that "GLORY HOUSE is a trademark of BJK Glory House Catering" and the business
7 of GLORY HOUSE is a restaurant and catering service company. These words are
8 shown on defendant Jo Ann Goin's website.

9 34. As a result Opposer Glory Yau-Huai Tsai's GLORY HOUSE trademark
10 ownership record and Opposer Glory Yau-Huai Tsai's GLORY HOUSE publishing and
11 printing business record were wiped out from the records of the Chamber of Commerce
12 through Jo Ann Goin's criminal conducts. "Wow, change the record!"

13 35. Opposer Glory Yau-Huai Tsai's constitutional right of personal identity
14 was also wiped from the Chamber of Commerce's records.

15 36. It is no wonder that the bureau of census sent an agent to
16 my house wanting to verify who "the husband" and who "the wife" is.

17
18 37. Opposer Glory Yau-Huai Tsai's GLORY HOUSE business still exist but
19 the business suddenly dropped since 2008. Opposer Glory Yau-Huai Tsai's business
20 kept losing money because those media websites continued to defame Oppose Glory
21 Yau-Huai Tsai's personal and business reputation by posting false information.

22
23 38. There were even other websites defaming Opposer Glory Yau-Huai Tsai
24 and Opposer Glory Yau-Huai Tsai's GLORY HOUSE business claiming Opposer
25 Glory Yau-Huai Tsai and Opposer Glory Yau-Huai Tsai's GLORY HOUSE business is
26 a place where one can find and buy romantic sex video, the West Covina area.

1 39. Because defendant Jo Ann Goin used her position as “a Chairwoman of the
2 Chamber of Commerce,” the public must believe that defendant Jo Ann Goin should be
3 the real owner of “the trademark of GLORY HOUSE” and the information provided
4 from her should be correct.

5 40. www.Manta.com, www,danb.com and other media websites act as tools
6 helping Defendant Jo Ann Goin to wipe out Opposer Glory Yau-Huai Tsai’s GLORY
7 HOUSE trademark rights, with intention of driving opposer Glory Yau-Huai Tsai’s business
8 out of the market by posting and **spreading false information to defame Opposer and**
9 **Opposer’s business reputation.**

10 41. www.Manta.com, other media websites, and their associated employees refused
11 to take down those web pages containing false information which indeed caused defamation
12 to Opposer Glory Yau-Huai Tsai’s personal reputation

13
14 42. **Did false information spread from the records of “the Chamber of**
15 **Commerce”? Who is the person sitting inside the Chamber of Commerce to**
16 **create and spread these false information?**

17 43. One of a media website, “www.consumerreviewdirectory.com”, used opposer
18 Glory Yau-Huai Tsai’s short name “Glory Tsai” to post and spread many ridiculous
19 information on their “www.consumerreviewdirectory.com” website, claiming Opposer
20 Glory Yau-Huai Tsai (Glory Tsai) as a person who is in the Hotels and Motels business,
21 with 25 other Businesses in West Covina.

22 44. Attached herein is Exhibit-19 , a screenshot of a web page from
23 “www.consumerreviewdirectory.com”.

24 Obviously, www.consumerreviewdirectory.com posted false contents to lead society
25 in West Covina to look down on Opposer Glory Yau-Huai Tsai’s honest personal reputation
26 and character, leading people to believe “Glory Tsai” as part of something that is inconsistent
27 to the facts.

1 45 Who is the person behind www.consumerreviewdirectory.com to
2 cause these defaming information to be posted and spread against Opposer
3 Glory Yau-Huai Tsai?

4 46 Attached herein Exhibit-20 is a screenshot of a web page from
5 www.instantcheckmate.com who sells Opposer Glory Yau-Huai Tsai's personal identity
6 information.

7 47. "www.instantcheckmate.com" not only sells Opposer Glory Yau-Huai Tsai's
8 personal information, but also sells *incorrect* information under opposer Glory Yau-Huai
9 Tsai's name or short name "Glory Tsai" for **\$1.00**

10 www.instantcheckmate.com calls it "Shock information";

11 "Shock! Shock! When you see it, you will be shocked".

12 48. "www.instantcheckmate.com and their group" obviously has malicious intent
13 to damage and to quickly spread Opposer Glory Yau-Huai Tsai's personal identity
14 information and announces to the world that Opposer Glory Yau-Huai Tsai's reputation is
15 worth **\$1.00..**

16 49. Where did those information come from? Did those information spread
17 from the "Chamber of Commerce"?

18 50. Attached herein, Exhibit- 21 is a webpage which was posted by "Dun &
19 Bradstreet Credibility Corp" on www.dandb.com. "Dun & Bradstreet Credibility
20 Corp." continuously posted and spread false information on www.dandb.com, lies to the
21 public and creates personal attack against Opposer Glory Yau-Huai Tsai's honest reputation
22 claiming that Opposer Glory Yau-Huai Tsai has been providing Motion Picture and Tape
23 Distribution from West Covina since 2010, having an estimated annual revenue of
24 \$110,000.00. Dun & Bradstreet Credibility Corp.'s false information against Opposer
25 Glory Yau-Huai Tsai has even brought the IRS and California Franchise Tax Board to doubt
26 Opposer Glory Yau-Huai Tsai's GLORY HOUSE business, sending Glory Yau-Huai Tsai an
27 audit letter.

1 **“Dun & Bradstreet Credibility Corp” calls their reports “Credibility Review”.**

2 **52. Who is the person behind “Dun & Bradstreet Credibility Corp” to**
3 **cause this defaming information to be posted against Opposer Glory Yau-Huai Tsai?**
4 **Did the information spread from the Chamber of Commerce’s record ?**

5 53. On July 28, 2015, I, Glory Yau-Huai Tsai sent a certified mail
6 (#7003 1680 0000 7657 2350) to defendant’s attorney to request defendant to give some
7 answers (Attached Exhibit-22 contains 7 pages and Exhibit-10 contains 1 page, total 8
8 pages.).

9
10 **CONCLUSION**

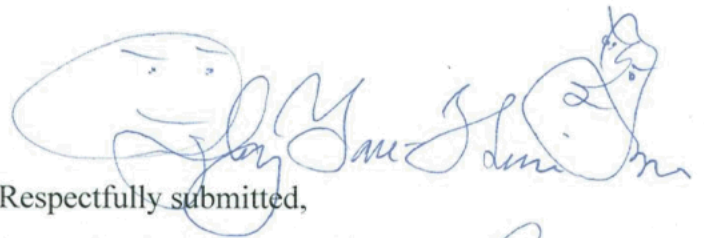
11 **According to the exhibits, I, Glory Yau-Huai Tsai, believe that there must be at**
12 **least one person inside the Chamber of Commerce using the position as an officer to**
13 **change records against Opposer Glory Yau-Huai Tsai. Those people wiped out Glory**
14 **Yau-Huai Tsai’s business records and even changed Opposer Glory Yau-Huai Tsai’s**
15 **identity. These people created false information and let it spread out to the public to**
16 **damage Opposer Glory Yau-Huai Tsai’s personal and business reputation.**

17 I, Glory Yau-Huai Tsai pray that the Trademark Trial and Appeal Board and the
18 Government of the United States help to find out who made these false information in official
19 records and let those incorrect information spread to the public.

20
21
22 The undersigned hereby declares and states that all the Exhibits submitted here are
23 truths and the statements made herein of my knowledge and belief are true, that all statements
24 made on information and belief are believed to be true, and that these statements were made
25 with the knowledge that willful false statements and the like so made are punishable by fine
26 or imprisonment, or both, under section 1001 of Title 18 of the United States Code, and such
27 willful false statements may jeopardize the validity of case.

1 **For the reasons and exhibits provided above and also according to**
2 **T.M.E.P. Section §1207 “Refusal on Basis of Likelihood of Confusion, Mistake or**
3 **Deception”, the trademark office should refuse and cancel registration under**
4 **Trademark Act Section 2(d), 15 U.S.C. §1052(d).**

5 **Defendant Jo Ann Goin’s application Serial Number 85-789420 should be**
6 **canceled.**

7
8
9
10
11


12 Dated: August 03, 2015

13 Respectfully submitted,

14 /GLORY YAU-HUAI TSAI/
15 GLORY YAU-HUAI TSAI
16 /GLORY YAU-HUAI TSAI/

*August 03
2015*

17 GLORY HOUSE
18 (626) 917-0657, (800) OK-GLORY, (626) 917-6423
19 www.glorynews.net, www.okglory.com
20 1512 E. MAPLEGROVE ST.
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