

ESTTA Tracking number: **ESTTA708951**

Filing date: **11/16/2015**

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	gloryhouse@glorynews.net,glory_tsai@verizon.net,glorytsai@okglory.com
Signature	/GLORY YAU-HUAI TSAI/
Date	11/16/2015
Attachments	Testimony by Plaintiff Glory Yau-Huai Tsai-on November 16, 2.pdf(703506 bytes)

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

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

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

**TESTIMONY AND DEPOSITION EXECUTED BY
PLAINTIFF GLORY YAU-HUAI TSAI
(November 16, 2015)**

I. Glory Yau-Huai Tsai declare

1. Plaintiff Glory Yau-Huai Tsai and his family has continuously been suffering business loss for more than five years since 2008. Plaintiff Glory Yau-Huai Tsai and his family are now enduring many headache situations.
2. Attached herein is an exhibit-23. It not only damaged Plaintiff Glory Yau-Huai Tsai's personal reputation but also Plaintiff Glory Yau-Huai Tsai's identity.
3. **Exhibit-23 is a screenshot of a web page from www.pipl.com. www.pipl.com continuously posted a male's face image which www.pipl.com allegedly found from outside of the United States, from somewhere in the world saying that person can be attached to an address located at El Monte, California, USA.**

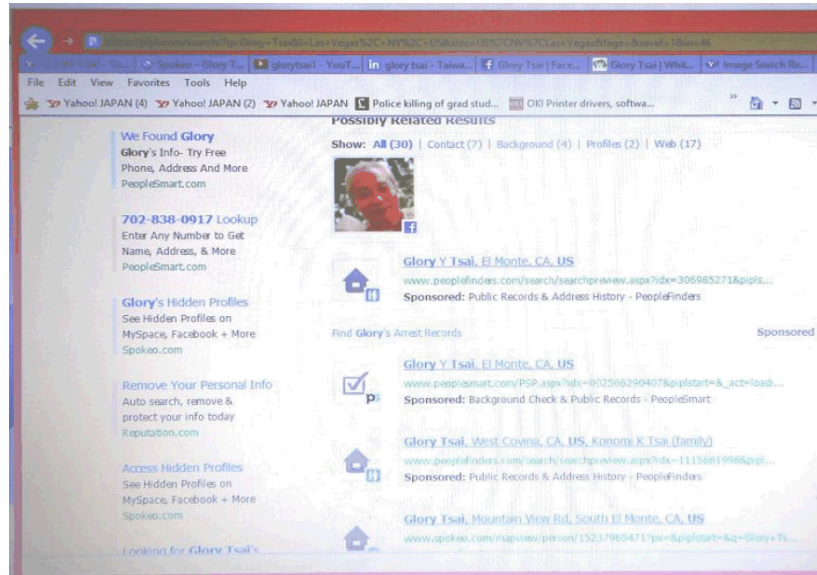
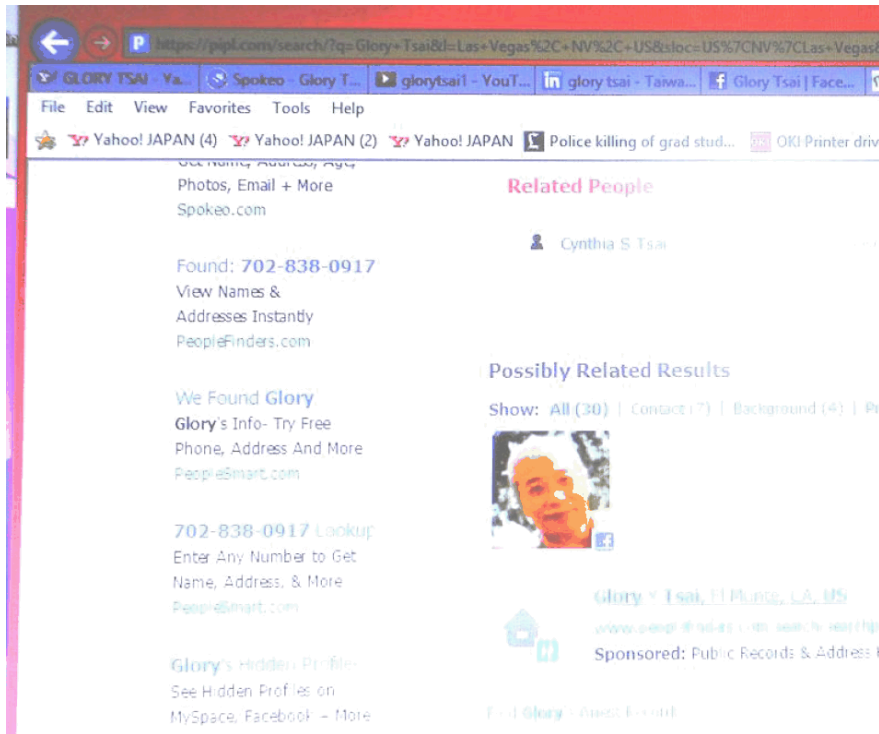


Exhibit-23 is a screenshot of a web page from www.pipl.com. www.pipl.com continuously posted a male's face image which www.pipl.com allegedly found from outside of the United States, from somewhere in the world saying that person can be attached to an address located at El Monte, California, USA. possibly related to or is the person who owns the house, properties and business inside of West Covina, California, USA.

GLORY YAU-HUAI TSAI
vs.
BJK Glory House Catering Co., LLC
Opposition No. 91212540
Exhibits offered by Plaintiff Glory Yau-Huai Tsai
Exhibit-23

1 4. More than twenty years ago, Plaintiff Glory Yau-Huai Tsai (Glory Tsai)
2 had a printing facility located inside the city of El Monte, California.

3
4 **5. I, GLORY YAU-HUAI TSAI (Glory Tsai) and my entire family do not**
5 **recognize the person's image on the web page of www.pipl.com.**

6
7 **6. www.pipl.com allege that the person (please see attached exhibit-23)**
8 **possibly related to the address which is located inside El Monte, California, U.S.A.**
9 **and also possibly related to or is the person who owns the house, properties and**
10 **business inside of West Covina, California, USA.**

11 7. Some “people search” websites even alleged **that another Glory Tsai**
12 **who lives in West Covina, inside of the United States is a female.**

13
14 **8. As a result of this false information, plaintiff Glory Yau-Huai Tsai's**
15 **constitutional rights of true identity wiped out. And plaintiff Glory Yau-Huai**
16 **Tsai's identity became an unknown person.**

17
18 9. Plaintiff Glory Yau-Huai Tsai has sufficient reasons to believe that
19 somebody used his or her position inside the Chamber of Commerce to wipe out
20 Plaintiff Glory Yau-Huai Tsai's personal identity and to also wipe out Plaintiff Glory
21 Yau-Huai Tsai's “GLORY HOUSE” business ownership.
22 Defendant “Jo Ann Goin” alleged that the “GLORY HOUSE” trademark ownership is
23 in record, belong to her.

24 10. Even if defendant Jo Ann Goin is asked to give her deposition, plaintiff
25 Glory Yau-Huai Tsai does not believe that defendant will honestly tell the truth.

26 **It is also financially hard for Plaintiff Glory Yau-Huai Tsai to find**
27 **out the truth one by one.**

1 11. Not only does it seem that Plaintiff Glory Yau-Huai Tsai's "GLORY
2 HOUSE" business activities in public records disappeared, but also Plaintiff Glory
3 Yau-Huai Tsai's (Glory Tsai's) GLORY HOUSE business ownership disappeared from
4 the records.

5 12. Plaintiff Glory Yau-Huai Tsai has sufficient reason to believe that
6 defendant Jo Ann Goin used her position as a member and chairwoman of the Chamber
7 of Commerce to change, ruin or wipe out Plaintiff Glory Yau-Huai Tsai's personal
8 identity and business records

9 13. Plaintiff Glory Yau-Huai Tsai's (Glory Tsai's) personal identity was
10 switched to a different person. Defendant Jo Ann Goin then alleged that she herself is
11 the trademark owner of "GLORY HOUSE", and defendant Jo Ann Goin put herself as
12 "the trademark owner of GLORY HOUSE" in the record and announcement in her
13 website saying "GLORY HOUSE is a trademark of Glory House Catering—"

14
15 14. **This exhibit-23 which I, Glory Yau-Huai Tsai submit herein proves that**
16 **serious confusion amongst society against Plaintiff Glory Yau-Huai Tsai and Plaintiff**
17 **Glory Yau-Huai Tsai's GLORY HOUSE business occurred as a result of those who stole**
18 **and falsely represented Plaintiff Glory Yau-Huai Tsai's personal identity and Plaintiff**
19 **Glory Yau-Huai Tsai's trademark business name GLORY HOUSE**

20 21 **CONCLUSION**

22 **According to the exhibits, I, Glory Yau-Huai Tsai, believe that there must be at**
23 **least one person inside the Chamber of Commerce using the position as an officer to**
24 **change records against Opposer Glory Yau-Huai Tsai. Those people wiped out Glory**
25 **Yau-Huai Tsai's business records and even changed Opposer Glory Yau-Huai Tsai's**
26 **identity. These people created false information and let it spread out to the public to**
27 **damage Opposer Glory Yau-Huai Tsai's personal and business reputation.**
28

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

4
5 The undersigned hereby declares and states that all the Exhibits submitted here are
6 truths and the statements made herein of my knowledge and belief are true, that all statements
7 made on information and belief are believed to be true, and that these statements were made
8 with the knowledge that willful false statements and the like so made are punishable by fine
9 or imprisonment, or both, under section 1001 of Title 18 of the United States Code, and such
10 willful false statements may jeopardize the validity of case.

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

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

17
18
19 Dated: November 16, 2015

Respectfully submitted,

/GLORY YAU-HUAI TSAI/

GLORY YAU-HUAI TSAI

/GLORY YAU-HUAI TSAI/

GLORY HOUSE

(626) 917-0657, (800) OK-GLORY, (626) 917-6423

www.glorynews.net, www.okglory.com

1512 E. MAPLEGROVE ST.

WEST COVINA, CALIFORNIA 91792

1 **CERTIFICATE OF SERVICE**

2 I, Glory Yau-Huai Tsai hereby certify that a true and correct copy of the foregoing
3 “TESTIMONY AND DEPOSITION EXECUTED BY PLAINTIFF GLORY YAU-HUAI TSAI,
4 (November 16, 2015), SIGNED ON November 16, 2015”, along with **Exhibit-23 inclusive**,
5 attached thereto were served via certified mail (7003 1680 0000 7657 2411) with return
6 receipt requested, postage fully prepaid, upon applicant's attorney **Lisa R. Hemphill** Gardere
7 Wynne Sewel, L.L.P. 3000 Thanksgiving Tower, 1601 Elm Street Dallas, Texas 75201-4761
8 on November 16, 2015.

9
10
11
12 /Glory Yau-Huai Tsai/
13 **Glory Yau-Huai Tsai**
14 Opposer in pro per
15 **GLORY HOUSE®**
16 (626) 917-0657, (800) OK-GLORY
17 www.glorynews.net, www.okglory.com
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16 **canceled.**

17
18
19 Dated: November 16, 2015

20 
Respectfully submitted,

21 /GLORY YAU-HUAI TSAI/ *Nov. 16, 2015*

22 GLORY YAU-HUAI TSAI

23 /GLORY YAU-HUAI TSAI/

24 GLORY HOUSE

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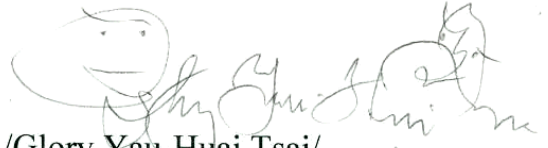
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on November 16, 2015.


/Glory Yau-Huai Tsai/
Glory Yau-Huai Tsai *Nov-16-2015*
Opposer in pro per
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