

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

**In the matter of Application Serial No. 78/755527 for AMERICAN DELI
Published in the Official Gazette on October 2, 2007**

| | | |
|------------------------------------|---|--------------------------------|
| _____ |) | |
| American Deli Plus, Inc., |) | |
| |) | |
| Opposer, |) | |
| |) | |
| vs. |) | Opposition No. 91181022 |
| |) | |
| Young Lee and Alexander Lee, d/b/a |) | |
| Clean Pass of Atlanta. |) | |
| |) | |
| Applicant. |) | |
| _____ |) | |

**APPLICANT’S RESPONSE TO
OPPOSER’S REQUEST FOR ADMISSIONS**

COMES NOW YOUNG LEE and ALEXANDER LEE, Applicants, and tenders Appellant’s Response to Opposer’s Request for Admissions and states as follows:

Request for Admission No. 1.

Answer: While the Opposer has used the instant name, SO HAS OTHERS besides the opposer and therefore the implication that the Opposer **is the only user of said name**, as applied is frivolous.

Request for Admission No. 2.

Answer: The use of said name application by the opposer has absolutely nothing to do with the instant application, as well as the FACT that Kim Chong Chum had orally agreed to compensate Young Lee and Alexander Lee for the use of the same. See Exhibit “A” as attached hereto.

Request for Admission No. 3.

Answer: See response to Request for Admission No. 2., and the same is incorporated into this admission answer.

Request for Admission No. 4.

Answer: See response to Request for Admission No. 2., and the same is incorporated into this admission answer.

Request for Admission No. 5.

Answer: This request for admission is not relevant to the instant case and is being advanced so as to attack the applicant's pending application which is not legally relevant to the instant application.

Request for Admission No. 6.

Answer: This request for admission is not relevant to the instant case and is being advanced so as to attack the applicant's pending application which is not legally relevant to the instant application.

Request for Admission No. 7.

Answer: This request for admission is not relevant to the instant case and is being advanced so as to attack the applicant's pending application which is not legally relevant to the instant application.

Request for Admission No. 8.

Answer: This request for admission is not relevant to the instant case and is being advanced so as to attack the applicant's pending application which is not legally relevant to the instant application.

Request for Admission No. 9.

Answer: Admitted.

Request for Admission No. 10.

Answer: ????

Request for Admission No. 11.

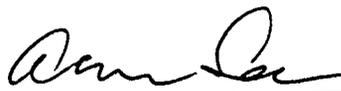
Answer: Applicant admits that Applicant's search showed that various companies were using said name in both Florida and Georgia, which is not relevant to the pending case since the opposer nor any of those companies or organizations has applied for trade mark rights.

Request for Admission No. 12.

Answer: Applicant admits that Applicant's search showed that various companies were using said name in both Florida and Georgia, which is not relevant to the pending case since the opposer nor any of those companies or organizations has applied for trade mark rights.



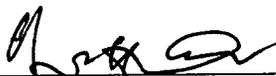
Young Lee



Alexander Lee

Certificate of Service

I hereby certify that I have served Paul T. Kim, Attorney at Law, a copy of the foregoing answers by placing a copy of the same into an envelope with sufficient postage to ensure delivery and placing the same into the United States Mail this 20th day of December, 2008.



Young Lee

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

In the matter of Application Serial No. 78/755527 for AMERICAN DELI
Published in the Official Gazette on October 2, 2007

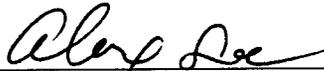
| | | |
|------------------------------------|---|-------------------------|
| American Deli Plus, Inc., |) | |
| |) | |
| Opposer, |) | |
| |) | |
| vs. |) | Opposition No. 91181022 |
| |) | |
| Young Lee and Alexander Lee, d/b/a |) | |
| Clean Pass of Atlanta. |) | |
| |) | |
| Applicant. |) | |

**APPLICANT'S RESPONSE TO OPPOSER'S
REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW YOUNG LEE and ALEXANDER LEE, Applicants, and tenders
Appellant's Response to Opposer's Request for Production of Documents as attached.



Young Lee



Alexander Lee

Applicant's answer to request of production of documents vs. opposer is as follows:

1. None – all communications were verbal, non-documented.
2. Agreement for payment of \$50,000 for use of the trademark – See Exhibit A
3. Agreement for payment of \$50,000 for use of the trademark – See Exhibit A
4. None
5. Prior civil case between American Deli Inc vs. Quiznos. This is not the same American Deli that Mr. Kim operates under, however, shows some proof that others have used the name therefore he is not entitled to be the sole owner of the name. (Mr. Ben if you think this is irrelevant or should not be used, please make changes accordingly.) - See Exhibit B
6. We have done the wing business as early as the mid 1980's. This may or may not be relevant. Most of all, we have affidavits of many people as witness that we used the name during our business in Forest Park. Furthermore, we also have a application for business tax under our business name: American Deli & Crawfish King. The affidavits that we have support the same location. – See Exhibit D 1 and D 2, along side with exhibits C 1 through C 14
7. We have done the wing business as early as the mid 1980's. This may or may not be relevant. Most of all, we have affidavits of many people as witness that we used the name during our business in Forest Park. Furthermore, we also have a application for business tax under our business name: American Deli & Crawfish King. The affidavits that we have support the same location. – See Exhibit D 1 and D 2, along side with exhibits C 1 through C 14
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9. We have done the wing business as early as the mid 1980's. This may or may not be relevant. Most of all, we have affidavits of many people as witness that we used the name during our business in Forest Park. Furthermore, we also have a application for business tax under our business name: American

Deli & Crawfish King. The affidavits that we have support the same location. – See Exhibit D 1 and D 2, along side with exhibits C 1 through C 14

10. Irrelevant

11. Irrelevant

12. Irrelevant

13. Irrelevant

14. Mr. Kim makes claims that he has used the mark since the 1980's however, American Deli Plus Inc entity was created in the Georgia Secretary of State website on 3/16/2006. Furthermore, Mr. Kim has made claims that he used the name in the 1980's, however, a recently released article from a popular Korean newspaper shows proof that he claims to have started using the name in 1992. Also, we have 2 advertisement attachments that show him advertising E-2 visa for immigrants. This would allow them visa to the US, however, many of these people were misled by this idea, most of all because he does not even own a national trademark to do so. Many of these people went flat broke after investing most of their money into this business. We got several phone calls from these people after advertising in the Korean newspaper that Mr. Kim was fraudulent (We can pull affidavits on a few of these people if you feel necessary, please advise) - See exhibit E 1 through E 4.

15. Obviously, if he had trademark rights we would not be fighting this case. - None

16. None

17. None

18. None

19. None

20. None

21. None

22. Mr. Kim makes claims that he has used the mark since the 1980's however, American Deli Plus Inc entity was created in the Georgia Secretary of State website on 3/16/2006. Furthermore, Mr. Kim has made claims that he used the name in the 1980's, however, a recently released article from a popular

Korean newspaper shows proof that he claims to have started using the name in 1992. Also, we have 2 advertisement attachments that show him advertising E-2 visa for immigrants. This would allow them visa to the US, however, many of these people were misled by this idea, most of all because he does not even own a national trademark to do so. Many of these people went flat broke after investing most of their money into this business. We got several phone calls from these people after advertising in the Korean newspaper that Mr. Kim was fraudulent (We can pull affidavits on a few of these people if you feel necessary, please advise) - See exhibit E 1 through E 4.

23. None

24. None

25. None

26. None

Authorization for Use of Trademark Name

Name of Company: Kim Chong Chun
Address: 3634 Hemley Park Ct.
City & State: Atlanta, GA 30340

Dear Sir or Madam,

Since you have agreed to the monthly and/or annual fee for the use of American Deli, this Authorization grants you the right to use said Trademark Name "American Deli" [USP Serial No. 78755527] allowing period of time for the Financial Compensation of \$50,000.00 for (60) months.

Beginning: August 21, 2007

Ending: August 21, 2012

You will be required to pay a renewal fee of the amount as heretofore indicated if you desire to continue using said Trademark Name after the forgoing time period lapses.

Mr. Yong Lee
Alexander Lee
Clean Pass of Atlanta
630 Indian Acres Court
Tucker, GA 30084
770.934.8037

Exhibit "A"

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

QFA ROYALTIES LLC and
QIP HOLDER LLC

Plaintiffs,

v.

AMERICAN DELI'S, INC.,
PETER J. DALEY and
SALLY A. DALEY,

Defendants.

Exhibit B

**COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY AND
PERMANENT INJUNCTIVE RELIEF, DAMAGES AND OTHER RELIEF**

Plaintiffs QFA Royalties LLC ("Quizno's") and QIP Holder LLP ("QIP") (Quizno's and QIP are sometimes collectively referred to as the "Quizno's entities"), by its attorneys, and for its Complaint for Temporary Restraining Order and Preliminary and Permanent Injunctive Relief, Damages and Other Relief ("Complaint") against Defendant American Deli's, Inc. ("Defendant Franchisee") and Defendants Peter J. Daley and Sally A. Daley ("Defendant Guarantors"), state as follows:

Nature of the Action

1. This is an action under the trademark laws of the United States for infringement and unfair competition, and for breach of contract. Plaintiffs seek, among other things, a temporary restraining order and preliminary and permanent injunction (i) enjoining Defendants and those acting in concert with them from wrongful and unlawful use of Quizno's federally

Un-sworn declaration under penalty of perjury

Here comes now, Darlene Russell pursuant to title 28 section 1746

United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Darlene Russell, hereby state that the following is completely true and factual, and will be held responsible for all statements. I, Darlene Russell, hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I, Darlene Russell, hereby state that Yong Lee used the mark "American Deli" in the county of Spalding in the state of Georgia for a period of time of at least 3 years, starting in the year of 1999. I hereby state that this is the truth, and without any false accusation or false statements.

I here by state that based on my personal knowledge, the foregoing statements are true under penalty and perjury.

Signed on this day 03 of 04 / 08
Day Month Year

Signature: Darlene Russell

Printed name: Darlene Russell

Exhibit "C-1"

Un-sworn declaration under penalty of perjury

Here comes now, Kyong S. Kim pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Kyong S. Kim, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Kyong S. Kim,
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Kyong S. Kim, hereby state that Yong Lee used "American Deli" in the
county of Spalding for a period of time of 3 yrs starting
in the year of 1999. I hereby state that this is the truth, and without any
false accusation or false statements.

Signed on this day 26 of 3 / 2008
Day Month Year

Signature: Kyong S. Kim

Printed name: Kyong S. Kim

Exhibit "C-2"

Un-sworn declaration under penalty of perjury

Here comes now, Young CHANG pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Young CHANG, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Young CHANG
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Young CHANG, hereby state that Yong Lee used "American Deli" in the
county of SPALDING for a period of time of 3 Yers starting
in the year of 1999. I hereby state that this is the truth, and without any
false accusation or false statements.

Signed on this day 28 of march, 08
Day Month Year

Signature: Young K Chang
Printed name: Young CHANG

Exhibit "C-3"

Un-sworn declaration under penalty of perjury

Here comes now, Lekechia Barkely pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Lekechia Barkely hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Lekechia Barkely
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Lekechia Barkely, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 03 of 04 / 08
Day Month Year

Signature: Lekechia Barkely

Printed name: Lekechia Barkely

Exhibit "C-4"

Un-sworn declaration under penalty of perjury

Here comes now, Charlene Russell pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Charlene Russell hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Charlene Russell
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Charlene Russell hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 03 of 04 / 08
Day Month Year

Signature: Charlene Russell

Printed name: Charlene Russell

Exhibit "C-5"

Un-sworn declaration under penalty of perjury

Here comes now, Su Yong Kim pursuant to title 28 section 1746 United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Su Yong Kim, hereby state that the following is completely true and factual, and will be held responsible for all statements. I, Su Yong Kim, hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I, Su Yong Kim, hereby state that Yong Lee used "American Deli" in the county of Spalding for a period of time of 3 Years starting in the year of 1999. I hereby state that this is the truth, and without any false accusation or statements.

Signed on this day 29 of March, 2008.
Day Month Year

Signature: 
Printed name: Su Yong Kim

Exhibit "C-6"

Un-sworn declaration under penalty of perjury

Here comes now, Shatika Prather pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Shatika Prather, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Shatika Prather
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Shatika Prather, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 3 of 4 / 2008
Day Month Year

Signature: Shatika Prather

Printed name: Shatika Prather

Exhibit "C-7"

Un-sworn declaration under penalty of perjury

Here comes now, David Neal pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, David Neal, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, David Neal,
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
David Neal, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
(3) years, starting in the year of (1999). I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 03 of 04 | 2008
Day Month Year

Signature: David M. Neal

Printed name: David Neal

Exhibit "c-8"

Un-sworn declaration under penalty of perjury

Here comes now, Roxan Walker pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Roxan Walker, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Roxan Walker
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Roxan Walker, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 03 of 04 / 2008
Day Month Year

Signature: Roxan Walker

Printed name: Roxan Walker

Exhibit "C-9"

Un-sworn declaration under penalty of perjury

Here comes now, Danny Long pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Danny Long, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Danny Long,
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Danny Long, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 3 of 21 / 2008
Day Month Year

Signature: Danny Long

Printed name: Danny Long

Exhibit "C-10"

Un-sworn declaration under penalty of perjury

Here comes now, Rodney Smith pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Rodney Smith, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Rodney Smith,
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Rodney Smith, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 3 of 4 / 2008
Day Month Year

Signature: Rodney Smith

Printed name: Rodney Smith

Exhibit "C-11"

Un-sworn declaration under penalty of perjury

Here comes now, Kentrell Reid pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Kentrell Reid, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Kentrell Reid
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Kentrell Reid, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 3 of 4, 08
Day Month Year

Signature: Kentrell C. Reid
Printed name: Kentrell Reid

Exhibit "C-12"

Un-sworn declaration under penalty of perjury

Here comes now, Jerome Miller pursuant to title 28 section 1746
United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Jerome Miller, hereby state that the following is completely true
and factual, and will be held responsible for all statements. I, Jerome Miller,
hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I,
Jerome Miller, hereby state that Yong Lee used the mark "American
Deli" in the county of Spalding in the state of Georgia for a period of time of at least
3 years, starting in the year of 1999. I hereby state that this is the
truth, and without any false accusation or false statements.

**I here by state that based on my personal knowledge, the foregoing statements are
true under penalty and perjury.**

Signed on this day 3 of 4 / 2008
Day Month Year

Signature: Jerome S. Miller
Printed name: Jerome S. Miller

Exhibit "C-13"

Un-sworn declaration under penalty of perjury

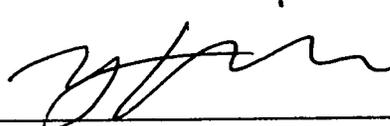
Here comes now, Young Sean Kim pursuant to title 28 section 1746 United States code.

I make the following statement(s) of my personal knowledge to be accurate and truthful.

I, Young Sean Kim, hereby state that the following is completely true and factual, and will be held responsible for all statements. I, Young Sean Kim hereby state that Yong Lee has used the mark, "American Deli" as early as of 1999. I, Young Sean Kim, hereby state that Yong Lee used the mark "American Deli" in the county of Spalding in the state of Georgia for a period of time of at least 3 years, starting in the year of 1999. I hereby state that this is the truth, and without any false accusation or false statements.

I here by state that based on my personal knowledge, the foregoing statements are true under penalty and perjury.

Signed on this day 3 of 4, 2008
Day Month Year

Signature: 

Printed name: Young Sean Kim

Exhibit "C-14"

APPLICATION FOR BUSINESS TAX

FOR CITY OF FOREST PARK USE

TAKE CARE TO USE A REALISTIC FIGURE. IF RETURN IS AUDITED IT WILL BE CLOSELY EXAMINED.

CITY OF FOREST PARK

BUSINESS TAX DIVISION

P.O. BOX 69

FOREST PARK, GA 30298-0069

(404) 366-4720

MUST BE COMPLETED & RETURNED

PRIOR TO: 12/15/2006

PLEASE READ CAREFULLY BEFORE COMPLETING
(NO P.O. BOXES PLEASE)

PLEASE PRINT

ACCOUNT #

DATE FILED

53

AMOUNT DUE

PENALTY

TOTAL

TRANSIENT

STATIONARY

722

1. GROSS DOLLAR VOLUME

2. NUMBER OF PERSONNEL

BUSINESS NAME & ADDRESS

AMERICAN DELI & CRAWFISH KING
4700 JONESBORO ROAD SUITE B
FOREST PARK, GA 30297

NOTE: BUSINESS TAX DEPARTMENT WILL CALCULATE FEE AND YOU WILL BE BILLED ACCORDINGLY. FOR FEE SCHEDULE CONTACT BUSINESS TAX DEPARTMENT. NON-TRANSFERABLE, INEFFECTIVE UPON CHANGE OF OWNERSHIP OR LOCATION.

IMPORTANT

IF YOU ARE LICENSED BY THE COUNTY OR STATE, A COPY OF YOUR LICENSE(S) MUST BE SUBMITTED WITH THIS APPLICATION.

PROPERTY LOCATION IF OTHER THAN MAILING ADDRESS

NONE

3. CHECK ONE: PARTNERSHIP _____ SOLE OWNER _____ CORP. _____ RENEWAL _____ AMENDED _____ NEW _____
DATE COMMENCED _____ TERMINATED _____ DATE _____

BUSINESS/CORPORATION NAME _____

DBA _____ BUSINESS PHONE (_____) _____

BUSINESS LOCATION _____ SUITE _____

CITY _____ STATE _____ ZIP CODE _____

MAILING ADDRESS _____

CITY _____ STATE _____ ZIP CODE _____

4. DOMINANT BUSINESS ACTIVITY (TYPE OF BUSINESS)

FOOD SERVICE

5. TO BE COMPLETED BY OWNER, IF PARTNERSHIP OR INCORPORATED, LIST OFFICERS NAME AND HOME ADDRESS ON SEPARATE SHEET. (NO P.O. BOXES PLEASE)

NAME _____

DATE OF BIRTH _____

TITLE _____

HOME PHONE # _____

RESIDENCE ADDRESS _____

DRIVERS LICENSE # _____

STATE _____

SOCIAL SECURITY # _____

FED. ID # _____

6. I (NAME) _____ BEING THE (TITLE) _____

DO HEREBY CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

CHECK IF ANY ADDITIONAL STATEMENT ATTACHED _____

SIGNATURE _____

DATE _____

APPLICATION FOR BUSINESS TAX

FOR CITY OF FOREST PARK USE

TAKE CARE TO USE A REALISTIC FIGURE. IF RETURN IS AUDITED IT WILL BE CLOSELY EXAMINED.

CITY OF FOREST PARK

BUSINESS TAX DIVISION

P.O. BOX 69

FOREST PARK, GA 30298-0069

(404) 366-4720

MUST BE COMPLETED & RETURNED
PRIOR TO: 12/15/2006

PLEASE READ CAREFULLY BEFORE COMPLETING
(NO P.O. BOXES PLEASE)

PLEASE PRINT

| | |
|---------------------------------------|---|
| ACCOUNT # 53 | DATE FILED |
| AMOUNT DUE _____ | |
| PENALTY _____ | |
| TOTAL _____ | |
| TRANSIENT <input type="checkbox"/> | STATIONARY <input checked="" type="checkbox"/> 722 |

1. GROSS DOLLAR
VOLUME

2. NUMBER OF
PERSONNEL

BUSINESS NAME & ADDRESS

AMERICAN DELI & CRAWFISH KING
4700 JONESBORO ROAD SUITE B
FOREST PARK, GA 30297

NOTE: BUSINESS TAX DEPARTMENT WILL CALCULATE FEE AND YOU WILL BE BILLED ACCORDINGLY. FOR FEE SCHEDULE CONTACT BUSINESS TAX DEPARTMENT.
NON-TRANSFERABLE, INEFFECTIVE UPON CHANGE OF OWNERSHIP OR LOCATION.

IMPORTANT

IF YOU ARE LICENSED BY THE COUNTY OR STATE, A COPY OF YOUR LICENSE(S) MUST BE SUBMITTED WITH THIS APPLICATION.

PROPERTY LOCATION IF OTHER
THAN MAILING ADDRESS

NONE

Exhibit "D-2"



Attachments

Georgia Secretary of State

Karen C. Handel

Archives • Corporations • Elections • News Room • Professional Licensure • Securities • State Capitol

- Search
- ▶ [By Business Name](#)
 - ▶ [By Control No](#)
 - ▶ [By Officer](#)
 - ▶ [By Registered Agent](#)
 - Verify
 - ▶ [Verify Certification](#)
 - New Filing
 - ▶ [Click here to file online for:](#)
 - ▶ [New Limited Liability Company \(LLC\)](#)
 - ▶ [New Business Corporation](#)
 - ▶ [New Non-Profit Corporation](#)
 - ▶ [New Professional Corporation \(PC\)](#)
 - Annual Registration
 - ▶ [Annual Registration](#)
 - Name Reservation
 - ▶ [File Name Reservation](#)
 - Online
 - Online Orders
 - ▶ [Register for Online](#)
 - Orders
 - ▶ [Order Certificate of Existence](#)
 - ▶ [Order Certified Documents](#)

View Filed Documents

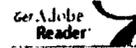
Date: 2/26/2008 (Annual Registration History etc.)

File Annual Registration Online

or

Print A Paper Annual Registration Form

PLEASE NOTE: To download your Annual Registration forms you will need Adobe Reader to view and/or print. If you do not have Adobe Reader installed on your computer, click the "Get Adobe Reader" button on the right to download the reader free of charge from the Adobe website.



Business Name History

| Name | Name Type |
|--------------------------|--------------|
| AMERICAN DELI PLUS, INC. | Current Name |

Profit Corporation - Domestic - Information

Control No.: 0623788
 Status: Active/Owes Current Year AR
 Entity Creation Date: 3/16/2006
 Jurisdiction: GA
 Principal Office Address: 5268 BUFORD HWY/STE. D
 Duluth GA 30097
 Last Annual Registration Filed Date: 2/2/2007
 Last Annual Registration Filed: 2007

Registered Agent

Agent Name: CHONG C. KIM
 Office Address: 3634 HENLEY PARK CT.
 ATLANTA GA 30340
 Agent County: FULTON

Officers

Title: CEO
 Name: CHONG C. KIM
 Address: 3634 HENLEY PARK CT.
 ATLANTA GA 30340

Title: CFO
 Name: CHONG C. KIM
 Address: 3634 HENLEY PARK CT.
 ATLANTA GA 30340

Title: Secretary
 Name: CHRISTINE HYECHON KIM
 Address: 3634 HENLEY PARK CT.
 ATLANTA GA 30340

Exhibit "E1"

Exhibit 'E3'

Ellenwood : Super Walmart(약22만), 주위에 주택 많음,
출근길 사거리 코너

출근길
4.SouthPoint-Wal 바로 앞에 있는 상가, 출근길-Sarbucks 바로 옆

2.Lite Avenue 크로거가 있음, 31만
3.Lifetime Fitness 앞 사거리 코너 상가

서핑센터

- Smyrna 지역, 새 건물 Publix 옆에 붙어있음, Starbucks 커피샵, Feder, Kroger 등 National 프랜차이즈가 밀집해 있음
- Forest Park - Johnsonco 선상 5,300 SF. Building & 3.28 acre Zoned C-1 \$66만

농장부지

- Decata 16acre, \$45만
한인 타운에서 20분 거리

Special

American Deli
지금 막 오픈했습니다.
로겐빌 지역
매매가격 : 14만 7천불

E-2 Visa
가능

신분문제로 해결하시고
안정된 사업체도 운영하십시오.



American Deli

American Deli식당의 Exclusive(독점) Agent로서 새로 오픈 예정인 장소들을 소개합니다. 여기에 명시된 지역들의 American Deli는 American Deli와 협의하에 Realty가 American Deli식당의 Exclusive(독점) Agent임을 알려 드리고, 추후에도 Realty가 소개해드린 American Deli장소는 Realty의 Exclusive(독점) Listing임을 알려드립니다. 식당 경험이 없어도 요리법이나 운영방식을 가르쳐 드립니다. 또한 용지도 확실히하게 도와드립니다.

Future Location (일부만 순서)

- ★ Alphretta-Super Target, 2008년말 예정
- ★ Athens-Super Walmart, 가격 \$168,000 1,200sf, 2008년 중반 예정
- ★ Atlanta-Publix, 2009년 초 예정
- ★ Avondale-Publix
- ★ Canton-Super Target, Koh's, Best Buy, 2009년 봄 예정
- ★ Cartersville-Super Walmart, 가격 \$168,000 1,200sf, 2008년 6월 예정
- ★ Covington-Super Walmart
- ★ Cumming-TJ Max, Best Buy, Dick's, Old Navy 등 2008년 5월 예정
- ★ Dawsonville-90만\$상가, 4Major Anchor와 10Junior Anchor
- ★ Decatur-주상복합
- ★ Ellenwood-Super Walmart
- ★ Fayetteville-Super Walmart+Publix, 1,100sf, 2008년 6월 예정
- ★ GA Teck-Kroger
- ★ Holcomb bridge-Super Target, Best Buy
- ★ Lindberg-Grocery Anchor
- ★ Loganville-Super Walmart, Home Depot 앞, 가격 \$150,000 1,400sf, 2008년 2월
- ★ McDonough-Kroger
- ★ Memorial Dr.-주상복합, 2009년 여름
- ★ Morrow-Super Walmart
- ★ Newnan-Super Walmart
- ★ Oakwood(gainsville)-Super Walmart, 2008년 여름 예정
- ★ Piedmont Rd-주상복합, Grocery Anchor
- ★ Rex-Coming Soon
- ★ Roswell-주상복합
- ★ Snellville-Publix, Target 앞
- ★ Stone Mountain-Coming soon
- ★ Suwanee-Super Walmart
- ★ Tyrer-Publix
- ★ Union City-30만\$상가
- ★ Villa Rica-Super Walmart 근처
- ★ Coving-Kroger 사펍센터 내
- ★ Old National Hwy.

자리

5%
New Contract

Unit 4, 800sf)

30sf
30sf
지을 수 있음
카리

CAP 8.5%

이월 분을 모집합니다.
우수선 하일 분)

6009

Exhibit "E4"

소재별로 구입할 수 있는 건물, 용지도 도와 드립니다.

American Deli

Intelli's Exclusive Listing **HOT**

버지니아의 보증수표라고 할 수 있는 American Deli를 통해 오와 인텔리 부동산이 자신있게 소개해 드립니다. American Deli는 현재 70여개 지역에서 성공중이며 7개 지역에서 개업 준비중입니다. 식당 경영이 없으셔도 알리가 있으신 분들은 트레이닝 센터에서 요리 테크닉은 물론 가게 운영 방법 등을 교육시켜 드리며 용자도 적극적으로 도와드립니다. 현재 개업중인 American Deli들은 수퍼 할마트 등 대형 쇼핑센터 옆에 위치해 있어 안전하고 수입이 보장됩니다.

HOT NEW

- **Banthead Hwy** 지역 **매매가: 20 만불, 11월 말 오픈 예정** 현재는 closed, **Trade 25, 좋은 입점 지역.**
- **East Ford** 지역 **매매가: \$20 만불로 11월 말 오픈 예정**
- **Webster** 지역 **매매가: 5 만불, 월 매출: 3만 7천불.**
- **월 수수료: 5만 5천불, 주변의 경쟁이 없고 높은 마진율을 유지하고 있음**
- **Cartersville Area / 2009년 4월에 오픈** 현재는 closed, **매매가: 8 만불 (주인의 개인 사항상 정할 수 있음)**
- **Atlanta** 지역/매매가: \$22만 5천불, 12개월 오픈 예정
- **Rockwood** 매매가 \$80,000, 매출상 \$80, 6개월간 가게
- **매매가 \$35만, 월 매출 1만 5천불** food court 있는 아주
- **인접한 가게 월 매출 4만 2천불, 월 수수료 1만 5천불.**

Business Development / Finance Officer

황비오가 콤플렉스 대장 시절부터 30여년간 살아온 동남부 각 주의 콤플렉스까지 원인을 현행에 맞춰 여러분의 눈과 말이 되어 버지니아 때때와 용자를 적극 도와드리겠습니다.

황비오

사업체 / 용자 전문인
Cell. 404.877.2224

Team Intelli 404.803.3000

Intelli

SBA Commercial
용자 상담
크레딧 조정
부수 상담



■ **메이컨 지역 고급 월 매출 있는 HOT HOT**
Creighton, Franchise
아주 인접한 지역에 있는 것으로 매매가 \$30만, 월 수수료로 주인 알리지 않고 \$0,000

■ **유행 열매**

- 1. **유행 열매 / 매매가: 20만불**
- 월 매출: 2만불
- 월 수수료: 2천불
- Soft Lake 물 지역
- 2. **유행 열매 / 매매가: \$30,000**
- 월 매출 \$18,000
- 매매상 \$45,000, 주매 사무실 아파트로 밀집된
- 리스타운 지역(아파트)
- 3. **유행 열매 / 매매가: \$22 만 5천불**
- 월 매출: \$3 만불
- 월 수수료: 4 만불 이상
- Downtown 지역, 그 옆에서 아주 잘 알려진 가게임

■ **서양 열매**

- 1. 미국 서양 (아름, 필립 프스크립트 백인 동네 지역
- 현재 미국인 주인이 은퇴하려고 하는 오래된 가게임
- 6월 오픈 (월요일 closed) 오전 6시-오후 2시까지 영업
- 자세를 추가하면 많은 매출을 올릴 수 있는 가게임
- 매매가: 9만불, 월 수수료: 5천불
- 2. **Orange food food**
- 매매가: \$10만 5천불, 월 수수료: 3,5천불
- 현재는 점심 식사만하고 있으나 아침과 저녁 식사도
- 추가할 수 있는 코너에 있는 개인 다용도
- 조식(아 스타일) 학교 근처에 위치하고 있음.
- 3. **일본 식당 / Diner 지역**
- 매매가: 3,52만불, 월 매출: 3,7만불 이상
- 아주 잘 알려진 고급 레스토랑

■ **미국의 주택 열매**

- 1. **매매가 10만불, 월 수수료 1만 4천불**
- Acworth 지역으로 구조화 손님에 좋고 있음
- 2. **매매가 \$85,000, 수수료 \$5,000-\$6,000**
- 영업시간: 월요일-금요일 오전 6시-오후 2시까지
- 공정 근처에 있는 공장 지역으로 고정 손님이 확보되어
- 있고 해안에는 초자연
- 3. **매매가: \$80,000** 월 매출 \$3,500
- 유니버시티 지역의 3000sqft 주택
- 4. **매매가: \$75,000** 월 매출 \$0,000-\$3,000
- 차터가의 내장 중인 지역

■ **서양 열매 열매**

- 1. **매매가 \$135,000, 월 수수료 \$8,000, 월 2만 9천**
- 영역이 넓어 매매가 3배에 비해 수입이 높고 운
- 사용 버지니아를 찾아가게 "강조"
- 2. **매매가 10만 5천불** 월 매출 5만 5천불
- Perth 매매가 \$30,000 \$100,000 50여개 시가
- 20여개 월 수수료 20,000 주인이 운영하던 월 \$5,
- 3. **매매가 \$25,000 - Redwood 9만 5천 1만 5천**
- 시장을 내어 있음, 최근 시가 100만 200만, 매
- 가주 단위로 판매 "HOT"

■ **매매가 14만 5천불 열매**

- 매매가 \$25,500, 월 매출 2만 5천, 월 수수료 1만 2천
- 매매가 지역 내의 아주 잘 알려진 좋은 장소임
- 6월 Open 으로 꾸준한 매출이 유지되고 있음

■ **매매가 12만 5천불 열매**

- E-2에서 가능 잘 알려진 버포드 한인 지역에 있음
- 매매가 \$22,500에 포함, 월 수수료: \$0,000

■ **가주 열매**

- 매매가 \$200,000 (인벤토리 및 배럴용 트럭 2대 3
- 수수료 \$10,000, 아파트 밀집 지역 20여개 방향 수로
- **Greory & Dale** 월 수수료 2만 5천불 이상
- 매매가 \$30,000 월 수수료 2만 5천불 이상
- 주인 open (월-금 8:00am-6:00pm)
- **Shoo Repair**
- 1. **인접한 1400 여섯 상점중, 매매가 \$50,000,**
- 월 수수료의 \$0,000이상 인접하고 구조화 매장
- 현재 사용하지 않는 디스폴링에 의해 ITBM 건물
- 화시만 매상 더 올릴 수 있음, W/American
- 2. **사람들의 내외 상점인 가게, 매매상 \$20,000**
- 월 수수료의 \$4,000, 매매가 \$20,000, 형상 비어:

■ **한국 매매가 가게 열매**

- 시외 지역으로 매매가: 주변에 경쟁이 없고
- 확보 E-2에서 가능

■ **고급 열매 열매 열매**

- 매매가 \$20,000
- 시외 지역 80만불 이상 돈 가게로 다우어유에 위
- 강점 있으나 큰 이익을 남길 수 있음.

■ **Breakfast 식당**

- 영업 장부 빌딩 내의 있는 고급 식당, 매매가 \$2
- 수수료의 1만 1천 Open 11:30-오후 3시까지

■ **발식 열매**

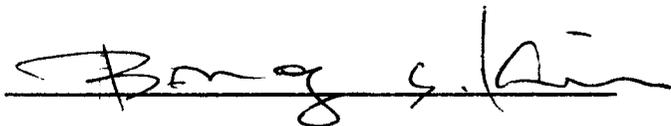
- 월 수수료: 5-6 천불 / E-2 Visa 가능

4274 Snackleford Rd, #A-1 Norcross, GA 30093 plus@gointelli.com www.gointelli.com

Office. 770.409.9959 fa

My name is Bong Seob Kim and Mr. Kim of American Deli Plus threatened me to remove American Deli sign from my restaurant. This was in the year of 2003 while I ran my wing restaurant on Austell Rd in Georgia. He told me that I had to remove the sign or pay a fee to use the name, but most of all he claimed that he had all superior rights to the name, and that no one was allowed to use the name without his authorization. I have come to know now that he does not even have trademark rights to the name, and feel that he has committed fraud. He was lying at the time and in no way does he have superior rights to the name. I removed the sign as he commanded and I know this has happened many times to many people.

Signed this day of November 17, 2008,

A handwritten signature in black ink, appearing to read "Bong S. Kim", written over a horizontal line.

Bong Seob Kim

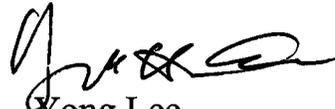
Documents for Review by Trademark and Appeal Board

Dear Sirs or Madam,

Enclosed you will find pertinent documentation as to the opposition issues presently before the Board.

Please review and consider the same as to the pending appeal case before the Board.

Respectfully,



Yong Lee

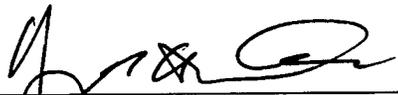
History of all pertinent facts

We advance the following pertinent information concerning the instant trade mark and following factual history related to the same, to wit:

1. We first started the wing business in Georgia in the late 1980's.
2. At the time, there were no Koreans in this type of business we were one of the first if not the very first.
3. Starting in 1998, we started a wing restaurant in Spalding County GA under the name American Deli.
4. From 1999 through 2004, we opened a wing restaurant in Clayton County GA, in the city of Forest Park, under the name of American Deli and Crawfish King.
5. In 2005 we applied for a registered trademark for American Deli through USPTO.gov.
6. After a long time process of trying to obtain the trademark, we were finally in the final stages of receiving it. Everything was going perfect. Then we met Mr. Kim of American Deli Plus and he offered to purchase the trademark for \$50,000.
7. He promoted the idea of having a written contract for this. So we created one and gave it to him.
8. He agreed to the terms of \$50,000.
9. Mr. Kim later came back stating that he needed a service mark not a trademark, and that we were in the process of obtaining a trademark. What he did not know is that though the marks are a bit different, obtaining a trademark would give easy access to obtaining a service mark, and if used in the manner of holding the name American Deli, was just as strong as holding a service mark. I was told this by a paralegal at uspto.gov
10. He then said that I should get an attorney and that he would talk to his, obviously he then took the route to try and steal the trademark from us after being under the impression that a trademark has no merit at all.

11. We tried to speak to him multiple times to come to an agreement, but he refuses to listen and now we fight this battle.
12. We spoke to him once and he did mention he paid over \$60,000 in attorney fees and we advised that he should not do that and allow us to get the trademark so that we can then transfer ownership to him.
13. Later on we published an article in the Atlanta Korean newspaper stating that Mr. Kim did not have exclusive rights to American Deli, in return, we received many calls from prior victims that either were threatened to not use the name, or did give in and bought one of Mr. Kim's stores and failed horribly. They requested legal advice because they felt they were fraudulently lied to.
14. Kang Lee was one of these people that came to us for help. He had bought a store under Mr. Kim, however, Mr. Kim kept the owners name under his so after the business was doing well, Mr. Kim banished Kang Lee and Kang Lee had no say whatsoever. He bought the store fair and square but Mr. Kim deceived him by not changing the owner name. He did this to see if the business would do well, if it did, he would keep it, and if it did not, he would give it to Kang Lee. This is illegal.
15. He used the idea of E-2 Visa which would give visa to immigrants to the U.S by persuading people to buy his stores in which he promises a visa in return. Though some of these people have received the visa, many have not, and even if they do receive the visa, the business does so horrible that they lose all of there investments if not more.
16. We are now where we are but most of all, Mr. Kim should be punished for his unethical practices in deceiving the people and continuing to do so. This is the type of person we are dealing with and he will go to no limit as long as his greed continues to grow.

Signed this 26th day of December, 2008.



Yong Lee

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

In the matter of Application Serial No. 78/755527 for AMERICAN DELI
Published in the Official Gazette on October 2, 2007

| | | |
|------------------------------------|---|-------------------------|
| American Deli Plus, Inc., |) | |
| |) | |
| Opposer, |) | |
| |) | |
| vs. |) | Opposition No. 91181022 |
| |) | |
| Young Lee and Alexander Lee, d/b/a |) | |
| Clean Pass of Atlanta. |) | |
| |) | |
| Applicant. |) | |

**APPLICANT'S RESPONSE TO
OPPOSER'S INTERROGATORY REQUEST**

COMES NOW YOUNG LEE and ALEXANDER LEE, Applicants, and tenders

Appellant's Response to Opposer's Interrogatory Request and states as follows:

Interrogatory Request No. 1.

Answer: Opposer is already aware of all times, places and circumstances with Applicant had communications with the Opposer. See Exhibit "A" as attached to Applicant's response to the Opposer's Request for Admissions, which states the oral agreement as entered into between Applicant and Opposer which Opposer has since acted dishonestly as clearly shown by the attached agreement.

Interrogatory Request No. 2.

Answer: Opposer is already aware of all times, places and circumstances with Applicant had communications with the Opposer. See Exhibit "A" as attached to Applicant's response to the Opposer's Request for Admissions, which states the oral agreement as entered into between Applicant and Opposer which Opposer has since acted dishonestly as clearly shown by the attached agreement.

Interrogatory Request No. 3.

Answer: None that is relevant to the instant pending trademark application.

Interrogatory Request No. 4.

Answer: Opposer is already aware of all times, places and circumstances with Applicant had communications with the Opposer. See Exhibit "A" as attached to Applicant's response to the Opposer's Request for Admissions, which states the oral agreement as entered into between Applicant and Opposer which Opposer has since acted dishonestly as clearly shown by the attached agreement.

Interrogatory Request No. 5.

Answer: Applicant during internet searches of Georgia and Florida, became aware of other organizations which have or are using said applied for trade mark application and NONE of the same has opposed the instant application but for said opposer who has opposed the same due to the fact that the Opposer decided in wilful and deliberate bad faith not to enter or abide by the agreement as attached as Exhibit "A" to the Request for Admissions answers.

Interrogatory Request No. 6.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 7.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 8.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 9.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 10.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 11.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 12.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 13.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 14.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 15.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 16.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 17.

Answer: Opposer is already aware of all times, places and circumstances with Applicant had communications with the Opposer. See Exhibit "A" as attached to Applicant's response to the Opposer's Request for Admissions, which states the oral agreement as entered into between Applicant and Opposer which Opposer has since acted dishonestly as clearly shown by the attached agreement.

Interrogatory Request No. 18.

Answer: This is interrogatory request is not relevant or pertinent to Applicant's pending trade mark application and Applicant opposes the relevance of the same pursuant to the instant pending trademark application as not be relevant or otherwise relevant to Applicant's pending trademark application.

Interrogatory Request No. 20/19. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 19/20. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 18/21. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 19/22. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 19/23. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 19/24. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 20/25. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 21/26. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 22/27. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 22/28. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 23/29. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 24/30. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue

to make bad faith claims against Applicants.

Interrogatory Request No. 25/31. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 20/32. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 21/33. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 22/34. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 24/35. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 25/36. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 25/37. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 20/38. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 22/39. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 23/40. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.

Interrogatory Request No. 23/41. (Lean how to read what you are typing)

Answer: This interrogatory is not relevant to Opposer's opposition other than to continue to make bad faith claims against Applicants.



Young Lee



Alexander Lee

Certificate of Service

I hereby certify that I have served Paul T. Kim, Attorney at Law, a copy of the foregoing answers by placing a copy of the same into an envelope with sufficient postage to ensure delivery and placing the same into the United States Mail this 20th day of December, 2008.



Young Lee