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

Proceeding	91181448
Party	Plaintiff Jeff Brown
Correspondence Address	Courtney Bru Doerner Saunders Daniel & Anderson 320 S. Boston Avenue, Suite 500 Tulsa, OK 74103 UNITED STATES rblue@dnda.com, cbru@dnda.com
Submission	Other Motions/Papers
Filer's Name	Courtney Bru
Filer's e-mail	cbru@dnda.com, rblue@dnda.com
Signature	/Courtney Bru/
Date	01/09/2009
Attachments	Opposer's Pretrial Disclosures.pdf (5 pages)(40691 bytes)

	stores selling merchandise displaying the “Patriot Guard Rider” mark; current and former PGR, Inc. “slogans;” PGR, Inc.’s initial response and strategy regarding the parties’ trademark applications and this Opposition; payments on behalf of and donations to PGR, Inc. and/or HOTH by Opposer; PGR, Inc. official and unofficial legal defense funds.		
Jeff Brown, Opponent c/o Rachel Blue, Doerner, Saunders, Daniel & Anderson, L.L.P., 320 S. Boston Ave., Suite 500 Tulsa, OK 74103-3725 (918) 582-1211	Creation, incorporation and structure of PGR and PGR, Inc.; creation and first use dates of “Patriot Guard Rider” mark; filing of trademark applications by Opposer and PGR, Inc.; Opposer’s intent with respect to creation, use and licensing of “Patriot Guard Rider” mark; conversations and correspondence with John Jacobs; ownership and/or operation of stores selling merchandise displaying the “Patriot Guard Rider” mark.	Notice of Opposition and subsequent pleadings and papers in this Opposition, including discovery responses and documents produced during discovery; invoices for merchandise displaying the “Patriot Guard Rider” mark; various correspondence; various documents depicting merchandise displaying the “Patriot Guard Rider” mark; general content of patriotguard.org.	Expects to Call
Kurt Mayer, current member and 30(b)(6) representative of PGR, Inc., c/o David J. Marr, Trexler, Bushnell, et al., The Clark Adams Building 105 West Adams Street, Suite 3600, Chicago, IL 60603-6210	Creation, incorporation and progression of PGR, Inc.; Jason Wallin’s role within PGR, Inc. and his departure from the Board of Directors; personal participation within PGR, Inc.; use of “Patriot Guard Rider” mark and various “slogans;” dates of such use; ownership of domain	Forum postings on patriotguard.org; general content of patriotguard.org; various correspondence.	May Call If Need Arises

(312) 704-1890	name patriotguard.org; maintenance of and regulation of content on patriotguard.org.		
Bonnie Perry, current member and 30(b)(6) representative of PGR, Inc., c/o David J. Marr, Trexler, Bushnell, et al., The Clark Adams Building 105 West Adams Street, Suite 3600, Chicago, IL 60603-6210 (312) 704-1890	Personal role within PGR, Inc.; incorporation and progression of PGR, Inc.; ownership and/or operation of various stores selling merchandise displaying the “Patriot Guard Rider” mark; initial use of slogan “Standing With Those Who Stood For Us;” PGR, Inc.’s investigation into filing of trademark application by Jeff Brown; filing of trademark applications by Jeff Brown and PGR, Inc.; use of “Patriot Guard Rider” mark; departure of Jason Wallin and Jeff Brown from PGR, Inc. Board of Directors; license(s) and/or proposal(s) from Jeff Brown to allow PGR, Inc. to use the “Patriot Guard Rider” mark.	Various correspondence; content of patriotgaurd.org; various documents depicting merchandise displaying the “Patriot Guard Rider” mark and various slogan(s); invoices for merchandise displaying the “Patriot Guard Rider” mark; forum postings on patriotguard.org; Notice of Opposition and subsequent pleadings and papers in this Opposition, including discovery responses and documents produced during discovery.	May Call If Need Arises
William Richart, current President and 30(b)(6) representative of PGR, Inc., c/o David J. Marr, Trexler, Bushnell, et al., The Clark Adams Building 105 West Adams Street, Suite 3600, Chicago, IL 60603-6210 (312) 704-1890	Personal role within PGR, Inc.; incorporation and progression of PGR, Inc.; ownership and/or operation of various stores selling merchandise displaying the “Patriot Guard Rider” mark; maintenance of and regulation of content on patriotguard.org; regulation of membership within PGR, Inc.; departure of Jeff Brown and Jason Wallin from	Various correspondence; content of patriotgaurd.org; various documents depicting merchandise displaying the mark “Patriot Guard Rider”; forum postings on patriotguard.org; various PGR, Inc. policies, including terms of use; trademark applications filed by Jeff Brown and PGR,	May Call If Need Arises

	<p>PGR, Inc. Board of Directors; use of “Patriot Guard Rider” mark; trademark applications filed by PGR, Inc. and Opposer; PGR, Inc.’s answer and affirmative defenses and factual bases therefore; negotiations with Jeff Brown prior or subsequent to the filing of the Opposition; license(s) and/or proposal(s) from Jeff Brown to allow PGR, Inc. to use the mark “Patriot Guard Rider.”</p>	<p>Inc.; PGR, Inc.’s initial response and strategy regarding such applications; Notice of Opposition and subsequent pleadings and papers in this Opposition, including discovery responses and documents produced during discovery; invoices for merchandise displaying the “Patriot Guard Rider” mark.</p>	
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DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

By: /s/ Courtney Bru

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of January, 2009, a true and correct copy of the above and foregoing was sent via electronic delivery to DMarr@trexlaw.com and mailed, with proper postage thereon, to:

David J. Marr
James R. Foley
James A. O'Malley
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/s/ Courtney Bru _____