

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

LFP IP, LLC,

Opposition No.:91192118

77/620,945

Plaintiff/Opposer

**APPLICANT LEGAL HUSTLERS  
REPLY IN SUPPORT OF MOTION  
FOR SUMMARY JUDGEMENT**

V.

LEGAL HUSTLERS, LLC

Defendant/Applicant

**I. REPLY TO PLAINTIFFS MOTIONS FOR SUMMARY JUDGEMENT**

Opposer LFP IP, LLC's letter for pretrial disclosures was mailed December 16, 2010. It requested a date of availability that we at LEGAL HUSTLERS, LLC would be able to make a court appearance in the Memphis area. We mailed a reply stating our situation; which was the start of a new job for Chief Manager Duane Stewart. We also offered an alternative date to meet. In the reply letter mailed out on January 18, 2010 from LFP IP, LLC they admitted receiving the letter and stated that they would wait to take my testimony until and if a new trial testimony period begins.

However a response to the motion for Summary Judgment was formed; after contacting the T.T.A.B, I was advised that the Summary Judgment from LFP IP, LLC was under



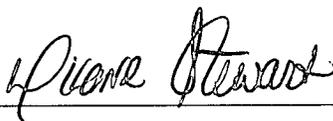
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investigation by the T.T.A.B and the investigation would take roughly 40 days causing the delay on the response for Summary Judgment.

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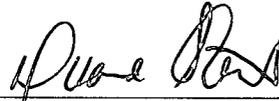
Enclosed are 2 letters from LFP IP, LLC stating details listed in the reply above.

Sincerely,  
Duane Stewart, Chief Manager  
LEGAL HUSTLERS

By: 

**CERTIFICATE OF SERVICE**

I Duane Stewart, hereby certify that a true copy of the Applicants Response to Motion for Plaintiff's Unopposed Summary Judgment was mailed February 13, 2011 first class postage upon the opposer LFP IP, LLC.



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Duane Stewart, LEGAL HUSTLERS  
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Millington, TN 38053  
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duanestewart\_heavenlybodys@yahoo.com



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Attorneys at Law

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Joseph J. Manna  
William P. Moore  
Jonathan W. Brown 5  
Philip Scaffidi  
Robert E. Ziske  
Thomas C. Burnham  
David C. Zimmerman 5  
Teresa A. Bailey  
John M. Lichtenthal  
Daniel M. Killelea  
Patrick J. Mackey 5  
James M. VanDette  
Matthew B. Morey  
Brittany L. Penberthy 8  
Melissa A. Cavagnaro  
Andrew O. Miller 3

December 16, 2010

Legal Hustlers, LLC  
9102 Kerrville Rosemark Road  
Millington, TN 38053  
Attn: Duane Stewart

Re: LFP IP, LLC v. Legal Hustlers, LLC  
TTAB Opposition No. 91192118

Dear Mr. Stewart:

Enclosed with this letter please find Pretrial Disclosures of Plaintiff/Opposer.

As you know, the trial testimony period in the above-referenced matter will begin in about two weeks. I would like to schedule your testimony deposition. Are you available January 13 or 14 to appear and testify in the Memphis area? Please respond as soon as possible so we can make the necessary arrangements.

Very truly yours,

LIPSITZ GREEN SCIME CAMBRIA LLP

By:   
Jonathan W. Brown

/lv  
Enclosures

OF COUNSEL  
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1 Also admitted in District of Columbia  
2 Also admitted in Florida  
3 Also admitted in California  
4 Also admitted in Ohio  
5 Also admitted in Illinois  
6 Also admitted in New Jersey  
7 Also admitted in Pennsylvania  
8 Also admitted in Connecticut





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Joseph J. Manna  
William P. Moore

January 18, 2011

Legal Hustlers, LLC  
9102 Kerrville Rosemark Road  
Millington, TN 38053  
Attn: Duane Stewart

Re: LFP IP, LLC v. Legal Hustlers, LLC  
TTAB Opposition No. 91192118

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Andrew O. Miller<sup>3</sup>  
Ian M. Jones  
Timothy P. Murphy<sup>1</sup>

Dear Mr. Stewart:

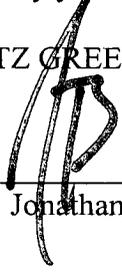
I am in receipt of your December 31, 2010 letter concerning your availability for a testimony deposition in the above-reference matter. Given the fact that my client has filed a Motion for Summary Judgment prior to the trial testimony period, we will wait to take your testimony until and if a new trial testimony period begins.

Very truly yours,

LIPSITZ GREEN SCIME CAMBRIA LLP

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