

ESTTA Tracking number: **ESTTA707932**

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

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

Proceeding	91217754
Party	Plaintiff Storeplan USA Corporation
Correspondence Address	SUNGJIN JI THE LAW OFFICES OF SUNGJIN JI 6301 BEACH BOULEVARD, SUITE 202 BUENA PARK, CA 90621 UNITED STATES sungjin.ji@gmail.com
Submission	Request to Withdraw as Attorney
Filer's Name	Sungjin Ji
Filer's e-mail	sungjin.ji@gmail.com
Signature	/Sungjin Ji/
Date	11/11/2015
Attachments	Response to Request for Information Regarding Civil Action.pdf(1115371 bytes)

1 Sungjin Ji (SBN: 265774)
2 JI LAW FIRM, APC.
3 6301 Beach Boulevard, Suite 202
4 Buena Park, CA 90621
5 Telephone: (714) 739-1500
6 Facsimile: (213) 385-5920

7 Prior-Attorney for Opposer,
8 Storeplan USA Corporation

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

11 STOREPLAN USA CORPORATION, a
12 California Corporation,

13 Opposition/Cancellation Interference No.
14 91217754

15 Opposer,

16 **RESPONSE TO REQUEST FOR
17 INFORMATION REGARDING CIVIL
18 ACTION**

19 vs.

20 SAMMY S. SON, an Individual.

21 Applicant.

22 Plaintiff's counsel who filed the oppositions for serial number 86142210 and serial number
23 86141864, Sungjin Ji, Esq., of the JI LAW FIRM, APC., is no longer representing Plaintiff
24 Storeplan USA Corporation for both the Civil Court and Trademark matters. The shareholders of
25 Plaintiff corporation have elected a new board of directors for Storeplan USA Corporation, who
26 have then hired attorney John Byung Lee, Esq. (SBN: 194032) for representation in both matters.

27 However, Mr. Lee, Esq. has failed to provide a substitution of attorney for the Civil suit,
28 and has failed to work with the JI LAW FIRM, APC., in changing the attorney information for the

1 trademark proceeding regarding Plaintiff's oppositions. Hence, the JI LAW FIRM, APC., can no
2 longer properly represent Plaintiff as there is no client contact, and Mr. Lee, Esq., has failed to
3 provide a proper substitution of attorney.

4 The motion to withdraw as attorney for the Civil matters has been filed for a hearing date
5 of December 4, 2015, 8:30 am, dept. 68. (See Attachment "1" – Motion To Be Relieved As
6 Counsel). Hence, we further request that Mr. Sungjin Ji, Esq., firm be removed as attorney for
7 Plaintiff in this matter, under JI LAW FIRM, APC., also known as Law Offices of Sungjin Ji.
8

9 By Ji. Sungjin
10 Sungjin Ji, Esq. Prior Attorney for
11 Opposer Storeplan USA Corporation,
12 a California Corporation

13 (714) 739-1500
14 Telephone Number
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Attachment "1" – Motion To Be Relieved As Counsel

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Sungjin Ji, Esq. (SBN: 265774) JI LAW FIRM, APC. 6301 Beach Blvd., Suite 202, Buena Park, CA 90621 TELEPHONE NO.: (714) 739-1500 FAX NO.: (213) 285-5920 ATTORNEY FOR (Name): Storeplan USA Corporation	FOR COURT USE ONLY CONFIRMED COPY OF ORIGINAL FILED Los Angeles Superior Court NOV 09 2015 Sherri R. Carter, Executive Officer/Clerk By: Moses Soto, Deputy
NAME OF COURT: Superior Court of California, County of Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	CASE NUMBER: BC551887
CASE NAME: Storeplan USA Corporation v. Samy Son, and St. Blue Bridgers Corp.	HEARING DATE: December 4, 2015 DEPT.: 68 TIME: 8:30 am BEFORE HON.: Mark Mooney DATE ACTION FILED: 07/16/2014 TRIAL DATE: 02/29/2016
NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL—CIVIL	

TO (name and address of client): Storeplan USA Corporation;

1. PLEASE TAKE NOTICE that (name of withdrawing attorney): **Sungjin Ji, Esq. (JI LAW FIRM, APC.)** moves under California Code of Civil Procedure section 284(2) and California Rules of Court, rule 3.1362, for an order permitting the attorney to be relieved as attorney of record in this action or proceeding.

2. A hearing on this motion to be relieved as counsel will be held as follows:

a. Date: December 4, 2015	Time: 8:30 am	Dept.: 68	Room:
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b. The address of the court: same as noted above other (specify):

3. This motion is supported by the accompanying declaration, the papers and records filed in this action or proceeding, and the following additional documents or evidence (specify):

(This motion does not need to be accompanied by a memorandum of points and authorities. Cal. Rules of Court, rule 3.1362.)

4. The client presently represented by the attorney is

- | | |
|--|---|
| a. <input type="checkbox"/> an individual. | g. <input type="checkbox"/> a trustee. |
| b. <input type="checkbox"/> a corporation. | h. <input type="checkbox"/> a personal representative. |
| c. <input type="checkbox"/> a partnership. | i. <input type="checkbox"/> a probate fiduciary. |
| d. <input type="checkbox"/> an unincorporated association. | j. <input type="checkbox"/> a guardian ad litem. |
| e. <input type="checkbox"/> a guardian. | k. <input checked="" type="checkbox"/> other (specify): |
| f. <input type="checkbox"/> a conservator. | |

A dissolved California Corporation.

(Continued on reverse)

CASE NAME: Storeplan USA Corporation v. Samy Son, and St. Blue Bridgers Corp.	CASE NUMBER: BC551887
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NOTICE TO CLIENT

If this motion to be relieved as counsel is granted, your present attorney will no longer be representing you. You may not in most cases represent yourself if you are one of the parties on the following list:

- A guardian
- A conservator
- A trustee
- A personal representative
- A probate fiduciary
- A corporation
- A guardian ad litem
- An unincorporated association

If you are one of these parties, **YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING LEGAL REPRESENTATION.** Failure to retain an attorney may lead to an order striking the pleadings or to the entry of a default judgment.

5. If this motion is granted and a client is representing himself or herself, the client will be solely responsible for the case.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

If this motion to be relieved as counsel is granted, you will not have an attorney representing you. You may wish to seek legal assistance. If you do not have a new attorney to represent you in this action or proceeding, and you are legally permitted to do so, you will be representing yourself. It will be your responsibility to comply with all court rules and applicable laws. If you fail to do so, or fail to appear at hearings, action may be taken against you. You may lose your case.

6. If this motion is granted, the client must keep the court informed of the client's current address.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

If this motion to be relieved as counsel is granted, the court needs to know how to contact you. If you do not keep the court and other parties informed of your current address and telephone number, they will not be able to send you notices of actions that may affect you, including actions that may adversely affect your interests or result in your losing the case.

Date: November 9, 2015

Sungjin Ji
(TYPE OR PRINT NAME)

Ji Sung-jin
(SIGNATURE OF ATTORNEY)

Attorney for (name):

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Sungjin Ji, Esq. (SBN: 265774) JI LAW FIRM, APC. 6301 Beach Blvd., Suite 202, Buena Park, CA 90621 TELEPHONE NO.: (714) 739-1500 FAX NO.: (213) 285-5920 ATTORNEY FOR (Name): Storeplan USA Corporation	FOR COURT USE ONLY CONFORMED COPY OF ORIGINAL FILED Los Angeles Superior Court NOV 09 2015 Sherri R. Carter, Executive Officer/Clerk By: Moses Soto, Deputy
NAME OF COURT: Superior Court of California, County of Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	CASE NUMBER: BC551887 HEARING DATE: Dec. 4, 2015 DEPT.: 68 TIME: 8:30 am BEFORE HON.: Mark Mooney DATE ACTION FILED: 07/16/2014 TRIAL DATE: 02/29/2015
CASE NAME: Storeplan USA Corp. v. Sammy Son, St. Blue Bridge Corp.	
DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL—CIVIL	

1. **Attorney and Represented Party.** Attorney (name): **Sungjin Ji, Esq. (JI LAW FIRM, APC.)** is presently counsel of record for (name of party): **Storeplan USA Corporation** in the above-captioned action or proceeding. *By: [Signature]*
2. **Reasons for Motion.** Attorney makes this motion to be relieved as counsel under Code of Civil Procedure section 284(2) instead of filing a consent under section 284(1) for the following reasons (describe):

On August 26, 2015, I obtained an email from John Byung Lee (SBN: 194032), who had obtained power of attorney from our client Storeplan USA Corporation sole shareholder, Storeplan Korea. Through the new power of attorney, as well as our agent for Storeplan USA Corporation being removed, Plaintiff's counsel can no longer represent Storeplan USA Corporation. However, the new counsel, Mr. Lee, has failed to provide a "substitution of attorney" despite numerous emails and phone calls. Hence, provided that I am no longer in communication with the agent of Storeplan USA Corporation and due to Mr. Lee's failure to communicate, I respectfully request this Court to grant my offices withdrawal from this matter. (See Exhibit "1" - Email Communications Between Plaintiff's Counsels)

Continued on Attachment 2.

3. **Service**

a. **Attorney has**

- (1) personally served the client with copies of the motion papers filed with this declaration. A copy of the proof of service will be filed with the court at least 5 days before the hearing.
- (2) served the client by mail at the client's last known address with copies of the motion papers served with this declaration.

b. **If the client has been served by mail at the client's last known address, attorney has**

- (1) confirmed within the past 30 days that the address is current
- (a) by mail, return receipt requested.
- (b) by telephone.
- (c) by conversation.
- (d) by other means (specify):

California Secretary of States Website showing Agent and Address.

(Continued on reverse)

CASE NAME: Storeplan USA Corp. v. Sammy Son, St. Blue Bridge Corp.	CASE NUMBER: BC551887
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3. b. (2) been unable to confirm that the address is current or to locate a more current address for the client after making the following efforts:
- (a) mailing the motion papers to the client's last known address, return receipt requested.
- (b) calling the client's last known telephone number or numbers.
- (c) contacting persons familiar with the client (*specify*):
 John Lee, Esq. Attorney for Storeplan USA Corporation
- (d) conducting a search (*describe*):
- (e) other (*specify*):

- c. Even if attorney has been unable to serve the client with the moving papers, the court should grant attorney's motion to be relieved as counsel of record (*explain*):

Counsel has no direct communication with Plaintiff and Plaintiff is allegedly represented by Mr. John Lee now. Attorney Lee has avoided all communications regarding substitution of attorney.

4. The next hearing scheduled in this action or proceeding
- a. is not yet set.
- b. is set as follows (*specify the date, time, and place*):
- c. concerns (*describe the subject matter of the hearing*):

Continued on Attachment 4.

5. The following additional hearings and other proceedings (including discovery matters) are presently scheduled in this case (*for each, describe the date, time, place, and subject matter*):

Continued on Attachment 5.

6. Trial in this action or proceeding
- a. is not yet set.
- b. is set as follows (*specify the date, time, and place*):
 02/29/2015

7. **Other.** Other matters that the court should consider in determining whether to grant this motion are the following (*explain*):

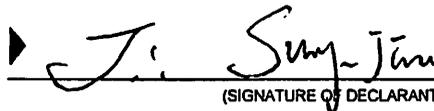
Essentially, Plaintiff's counsel is no longer in communication with Plaintiff as the Corporate Shareholders have elected new agents and a new attorney, Mr. Lee, to represent Plaintiff's interest. Hence, without such communication, it is impossible for the JI LAW FIRM, APC. to continue to represent Plaintiff Storeplan USA Corporation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: November 9, 2015

Sungjin Ji

(TYPE OR PRINT NAME)


 (SIGNATURE OF DECLARANT)

8. Number of pages attached: _____

Exhibit "1" - Email Communications Between Plaintiff's Counsels



Sungjin Ji <sungjin.ji@gmail.com>

storeplan usa

9 messages

John Lee <jblaw13@gmail.com>
To: sungjin.ji@gmail.com

Wed, Aug 26, 2015 at 3:21 PM

Dear Mr. Ji:

This firm represents Blue family Holdings, Inc. Attached please find a letter regarding Storeplan USA Corp.

Sincerely,

John Lee

Law Offices of Lee & Kim
2839 El Presidio Street, 2nd Floor
Carson, CA 90810

3 attachments **ji letter.pdf**
727K **executed poa.pdf**
614K **letter of confirmation.pdf**
1101K

John Lee <jblaw13@gmail.com>
To: Sungjin Ji <sungjin.ji@gmail.com>

Wed, Sep 2, 2015 at 6:31 PM

Dear Mr. Ji:

Despite Blue Family Holdings, Inc.'s written correspondence to you as the attorney in fact for Storeplan USA Corporation, I have yet to hear a single response from you.

Attached for your reference please find another copy of the power of attorney, letter of confirmation, and a corporate register for Storeplan Korea issued by the Seoul District Court in Korea dated August 26, 2015. As you can see, the CEO documented on the corporate register is the same person that executed the POA.

Please also be advised that Chanho Byun has been elected as the director, president, CFO and secretary of Storeplan USA Corporation. Any and all alleged individuals claiming to hold any of the afore-mentioned positions have been terminated.

In light of the above, I have been authorized to instruct you that you are hereby removed as legal counsel for Storeplan USA Corporation. Cease from any further all further representation of Storeplan USA Corp. immediately. Substitution of Attorney forms will be sent to for your immediate execution.

In addition, as the former attorney of Storeplan USA Corp., I would suggest that you refrain from any conduct that would be considered a conflict of interest or other breach of your legal and/or ethical duties to Storeplan USA Corp.

Please be advised that if you choose to disregard Storeplan USA Corp's instruction, legal action will be immediately taken.

If you have any question, please feel free to contact me at your earliest convenience.

John Lee

Law Offices of Lee & Kim
3731 Wilshire Blvd., Suite 940
Los Angeles, CA 90010

[Quoted text hidden]

3 attachments

 **executed poa.pdf**
614K

 **letter of confirmation.pdf**
1101K

 **corporate registry.pdf**
777K

Sungjin Ji <sungjin.ji@gmail.com>
To: John Lee <jblaw13@gmail.com>

Thu, Sep 3, 2015 at 9:49 AM

Dear Mr. Lee,
I'm in receipt of your emails and am reviewing the documents you sent.
After I complete reviewing them, I will let you know.
Sincerely,
Sungjin Ji, Esq.

On Wed, Sep 2, 2015 at 6:31 PM, John Lee <jblaw13@gmail.com> wrote:

Dear Mr. Ji:

Despite Blue Family Holdings, Inc.'s written correspondence to you as the attorney in fact for Storeplan USA Corporation, I have yet to hear a single response from you.

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Please be advised that if you choose to disregard Storeplan USA Corp's instruction, legal action will be immediately taken.

If you have any question, please feel free to contact me at your earliest convenience.

John Lee

Law Offices of Lee & Kim
3731 Wilshire Blvd., Suite 940
Los Angeles, CA 90010

On Wed, Aug 26, 2015 at 3:21 PM, John Lee <jblaw13@gmail.com> wrote:

Dear Mr. Ji:

This firm represents Blue family Holdings, Inc. Attached please find a letter regarding Storeplan USA Corp.

Sincerely,

John Lee

Law Offices of Lee & Kim
2839 El Presidio Street, 2nd Floor
Carson, CA 90810

JI LAW FIRM A Professional Corporation

6301 Beach Boulevard Suite 202, Buena Park, CA 90621
Phone: (714) 739-1500. Fax: (213) 385-5920.
Email: sungjin.ji@gmail.com. Website: www.jilaws.com

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

John Lee <jblaw13@gmail.com>
To: Sungjin Ji <sungjin.ji@gmail.com>

Wed, Sep 9, 2015 at 11:19 AM

Dear Mr. Ji:

It has been approximately 2 weeks since my initial email to you informing you of the power of attorney granted to Blue Family Holdings, Inc. I have provided copies of notarized documents from the sole shareholder of Storeplan USA Corp, documents from the current management of Storeplan USA Corp, and official documents issued by the Seoul District Court in the Republic of Korea supporting Blue Family Holdings, Inc.'s position. As of the date of this email I have received no meaningful response from you except that you are looking into the matter and that you will get back to me.

Pursuant to my telephone call to you this morning, this email shall confirm our telephone conversation in which you informed me that you would provide me with a written response by today. As you are probably aware, time is of the essence.

You and/or your alleged client are hereby on notice that you and/or your client will be held liable for any additional costs, damages, etc that are incurred as a result of any further delays and/or refusal to abide by the directions of Storeplan USA Corp. Storeplan USA Corp has been patient under the circumstances but it cannot wait any longer. If I do not receive a response from you by today (as you promised to me that you would), I will assume that you have no interest in cooperating and take whatever legal action that is necessary to resolve this matter. Please govern yourself accordingly.

John Lee

John Lee

Law Offices of Lee & Kim
3731 Wilshire Blvd., Suite 940
Los Angeles, CA 90010

[Quoted text hidden]

Sungjin Ji <sungjin.ji@gmail.com>
To: John Lee <jblaw13@gmail.com>

Wed, Sep 9, 2015 at 5:04 PM

Hello Mr. Lee:

Our office has received and reviewed your documents. Provided that Storeplan Korea is the sole shareholder of Storeplan USA, and assuming all of your documents are valid, our office will comply upon a valid election of a new CEO as per Storeplan USA's bylaws. Currently, Ms. Kyung Ran Kim is still the CEO of Storeplan USA as per corporate documents.

Sincerely,

Sungjin Ji
[Quoted text hidden]

John Lee <jblaw13@gmail.com>
To: Sungjin Ji <sungjin.ji@gmail.com>

Fri, Sep 11, 2015 at 11:30 AM

Dear Mr. Ji:

Your response dated September 9, 2015 is completely inadequate, further proof of your intentional disregard of Storeplan USA Corp's instructions, and evidence of your deliberate breach of your ethical and moral duties to Storeplan USA Corp. Storeplan USA Corp is having a really hard time understanding your position and continued refusal to cooperate. I don't think you truly understand the seriousness of this matter. Despite the seriousness of this matter, you have failed to contact me even once to discuss this matter. Furthermore, when I called you, you refused to discuss the matter over the telephone and told me you would send me an email. This is further evidence of your intentional disregard of the instructions Storeplan USA Corp. and continued violation of its rights.

Basically, your email states that you will comply with the earlier instructions if the following 3 conditions are satisfied: (1) Storeplan USA Corp is the sole shareholder; (2) all of the documents provided to you are valid; and (3) a new CEO is elected pursuant to Storeplan USA Corp's bylaws. Please correct me if I am incorrect in my understanding of your email.

Let me begin by reminding you that you do not represent Ms. Kyung Ran Kim, or do you? Please immediately advise if you do represent her as this will create a conflict of interest and affect the outcome of

this matter. If you do represent her, you will be in violation of your legal and ethical obligations to Storeplan USA Corp. Furthermore, whether or not you do represent her, your continued communication with her and disclosure of corporate information and documents is illegal and a violation of Storeplan USA Corp's rights. In case it was not made clear, please be advised that Ms. Kyung Ran Kim is not an officer, director, or employee of Storeplan USA Corp and she has no affiliation with the company. DO NOT communicate with her, provide her with any corporate information, or provide her with any corporate documents without the express written consent of Blue Family Holdings, Inc. in every instance.

As you are well aware, Storeplan Korea is the sole shareholder of Storeplan USA Corp. If are trying to allege that Ms. Kyung Ran Kim or even you for that matter own stock of Storeplan USA Corp, I strongly suggest you inform me now. The documents that were provided to you are valid. They have been notarized, issued by the District Court in Seoul, or executed by the legal CEO of Storeplan Korea. If you do not agree, let me know now. I have yet to receive a single document from you that would prove otherwise. In addition, I have already informed you that Chanho Byun has been elected as president and director of Storeplan USA Corp. Are you suggesting that I need to provide written proof to you of such election before you will comply with Storeplan USA Corp's instructions. As the alleged attorney of Storeplan USA Corp, I really don't think you are in a position to demand any such proof. Those documents are confidential internal documents of Storeplan USA Corp. More than enough proof has been provided to you already. Your request for such proof would make a little sense if you do in fact represent Kyung Ran Kim.

Storeplan USA Corp has had enough of your continued violation of its rights. As the alleged attorney for Storeplan USA Corp, you are held to a higher standard. Storeplan USA Corp hereby demands the following by the end of the day:

1. An unconditional acknowledgement that you will abide by the instructions of Storeplan USA Corp (through its legal poer of attorney Blue Family Holdings, Inc.) without further delay.
2. Written confirmation that you, as the attorney for Storeplan USA Corp, will cease all communications with Ms. Kyung Ran Kim regarding Storeplan USA Corp's business or corporate matters.
3. Written confirmation that you and/or anyone related to you do not allege to own any stock or other type of ownership in Okrumong or its related business.
4. Written confirmation as to whether or not you represent Ms. Kyung Ran Kim.

If I do not receive the demands requested above by the end of the day, legal action will be taken immediately against all of the parties involved. This is the last warning that you will receive. Storeplan USA Corp will no longer tolerate your continuous and intentional violation of its rights. I recommend that you consider the serious nature of this matter and the affect your intentional violations of the legal rights of Storeplan USA Corp will have on you and Kyung Ran Kim.

John Lee

Law Offices of Lee & Kim
3731 Wilshire Blvd., Suite 940
Los Angeles, CA 90010

[Quoted text hidden]

Sungjin Ji <sungjin.ji@gmail.com>
To: John Lee <jblaw13@gmail.com>

Fri, Sep 11, 2015 at 5:38 PM

Dear Mr. Lee:

I have now had the opportunity to fully review the information provided by you and your firm to this office

As we have discussed previously, we understand that we are counsel for, and our client is, Storeplan USA Corp, in the legal matter you have referenced.

We also acknowledge that you as a licensed attorney and officer of the court, have provided correspondence from you and your firm, with supporting documents, warranting that you have authority to speak for, and are directing this firm on behalf of and as legal representative of Storeplan USA, for our firm to cease further work on this matter, and to execute substitutions of attorney substituting your firm for ours in the matter.

Based on our review of the records provided by you, and your warranting their authenticity as well as your warranting your apparent authority to speak on behalf of and provide directions on behalf of, it appears, our joint client, Storeplan USA, we will agree to cease further activity on this matter at this time, and execute a substitution of attorney of the subject matter in favor of your firm.

Please notify us at once of the logistics of transferring your firm as attorney of record as to this matter.

Yours truly,
Sungjin Ji, Esq.
[Quoted text hidden]

John Lee <jblaw13@gmail.com>
To: Sungjin Ji <sungjin.ji@gmail.com>

Fri, Sep 11, 2015 at 7:08 PM

Thank you. I appreciate your cooperation and understanding in this matter.

[Quoted text hidden]

Sungjin Ji <sungjin.ji@gmail.com>
To: John Lee <jblaw13@gmail.com>
Cc: Amit Prakash <amitprakashlaw@gmail.com>

Mon, Oct 19, 2015 at 4:46 PM

Dear Mr. John Lee:

My associate, Amit Prakash, Esq., has attempted to contact you numerous times with regards to a substitution of attorney with regards to Storeplan USA Corporation. Yet, our firm has not received a response. It has been over a month and your office has failed to act. Are you in fact attorney for Storeplan USA Corporation?

Provided that your office failed to provide a substitution of attorney, please see the attached substitute of attorney for you to fill in your portions. Once signed, please return to our firm so that you can obtain my signature for filing.

Moreover, please confirm that you have in fact provided a change of attorney under the USPTO trademark application regarding "Okrumong".

Sincerely,

Sungjin Ji
[Quoted text hidden]

 Substitution of Attorney (Storeplan).pdf
178K

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Sungjin Ji, Esq. (SBN: 265774) JI LAW FIRM, APC. 6301 Beach Blvd. Suite 202, Buena Park, CA 90621 TELEPHONE NO.: (714) 739-1500 FAX NO. (Optional): (213) 285-5920 E-MAIL ADDRESS (Optional): sungjin.ji@gmail.com ATTORNEY FOR (Name): Storeplan USA Corporation	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	REC'D NOV 09 2015 FILING WINDOW
CASE NAME: Storeplan USA Corporaion v. Sammy Son, and St. Blue Bridgers Corp.	CASE NUMBER: BC551887
ORDER GRANTING ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL—CIVIL	HEARING DATE: Dec. 4, 2015 DEPT.: 68 TIME: 8:30 am BEFORE HON: Mark Mooney DATE ACTION FILED: 07/16/2014 TRIAL DATE: 02/29/2016

- The motion of (name of attorney): **Sungjin Ji, Esq. (JI LAW FIRM, APC.)** to be relieved as counsel of record for (name of client): **Storeplan USA Corporation** a party to this action or proceeding, came on regularly for hearing at the date, time, and place indicated above.
- The following persons were present at the hearing:

By Fax

FINDINGS

- Attorney has
 - personally served the client with papers in support of this motion.
 - served client by mail and submitted a declaration establishing that the service requirements of California Rules of Court, rule 3.1362, have been satisfied.
- Attorney has shown sufficient reasons why the motion to be relieved as counsel should be granted and why the attorney has brought a motion under Code of Civil Procedure section 284(2) instead of filing a consent under section 284(1).

ORDER

- Attorney is relieved as counsel of record for client
 - effective upon the filing of the proof of service of this signed order upon the client.
 - effective on (specify date):
- The client's current last known address and telephone number:
1111 WILSHIRE BLVD, STE 724, Los Angeles, CA 90017

If the client's current address is known, service on the client must hereafter be made at that address unless otherwise ordered in item 13. If the current address is not known, service must be made according to Code of Civil Procedure section 1011 (b) and rule 3.252 of the California Rules of Court.

- The next scheduled hearing in this action or proceeding is set for (date, time, and place):
 - The hearing will concern (subject matter):

NOTICE TO CLIENT
 You or your new attorney, if any, must prepare for and attend this hearing.

CASE NAME: Storeplan USA Corporaion v. Sammy Son, and St. Blue Bridgers Corp.	CASE NUMBER: BC551887
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8. The following additional hearings and other proceedings (including discovery matters) are set in this action (*describe the date, time, place, and subject matter of each*):
9. The trial in this action or proceeding:
- a. is not yet set.
- b. is set for (*specify date, time, and place*):
02/29/2015; 9:30 am; Dept. 68
10. Client is hereby notified of the following effects this order may have upon parties.

NOTICE TO CLIENT

Your present attorney will no longer be representing you. You may not in most cases represent yourself if you are one of the parties on the following list:

- A guardian
- A conservator
- A trustee
- A personal representative
- A probate fiduciary
- A corporation
- A guardian ad litem
- An unincorporated association

If you are one of these parties, YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING LEGAL REPRESENTATION. Failure to retain an attorney may lead to an order striking the pleadings or to the entry of a default judgment.

11. Client is notified that, if the client will be representing himself or herself, the client shall be solely responsible for the case.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

You will not have an attorney representing you. You may wish to seek legal assistance. If you do not have a new attorney to represent you in this action or proceeding, and you are legally permitted to do so, you will be representing yourself. It will be your responsibility to comply with all court rules and applicable laws. If you fail to do so, or fail to appear at hearings, action may be taken against you. You may lose your case.

12. Client is notified that it is the client's duty to keep the court informed at all times of the client's current address.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

The court needs to know how to contact you. If you do not keep the court and other parties informed of your current address and telephone number, they will not be able to send you notices of actions that may affect you, including actions that may adversely affect your interests or result in your losing the case.

13. The court further orders (*specify*):

Date:

JUDGE OR JUDICIAL OFFICER

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Sungjin Ji, Esq. (SBN: 265774) JI LAW FIRM, APC. 6301 Beach Blvd. Suite 202, Buena Park, CA 90621 TELEPHONE NO.: (714) 739-1500 FAX NO. (Optional): (213) 285-5920 E-MAIL ADDRESS (Optional): sungjin.ji@gmail.com ATTORNEY FOR (Name): Storeplan USA Corporation	FOR COURT USE ONLY CONFIRMED COPY OF ORIGINAL FILED Los Angeles Superior Court NOV 09 2015 Sherri R. Carter, Executive Officer/Clerk By: Moses Soto, Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	CASE NUMBER: BC551887
PLAINTIFF/PETITIONER: Storeplan USA Corporation DEFENDANT/RESPONDENT: Sammy Son, St. Blue Bridgers Corporation	JUDGE: Mark Mooney DEPT.: 68
PROOF OF SERVICE—CIVIL Check method of service (only one): <input type="checkbox"/> By Personal Service <input checked="" type="checkbox"/> By Mail <input type="checkbox"/> By Overnight Delivery <input type="checkbox"/> By Messenger Service <input type="checkbox"/> By Fax <input type="checkbox"/> By Electronic Service	

(Do not use this proof of service to show service of a Summons and complaint.)

1. At the time of service I was over 18 years of age and not a party to this action.
2. My residence or business address is:
 6301 Beach Blvd., Suite 202, Buena Park, CA 90621
 By Fax
3. The fax number or electronic service address from which I served the documents is (complete if service was by fax or electronic service):
4. On (date): _____ I served the following documents (specify):
 1) Notice of motion and motion to be relieved as counsel; 2) Declaration in support of attorney's motion to be relieved as counsel; and 3) Order grantings attorney's motion to be relieved as counsel.
 The documents are listed in the Attachment to Proof of Service—Civil (Documents Served) (form POS-040(D)).
5. I served the documents on the person or persons below, as follows:
 - a. Name of person served:
 - b. (Complete if service was by personal service, mail, overnight delivery, or messenger service.)
 Business or residential address where person was served:
 - c. (Complete if service was by fax or electronic service.)
 (1) Fax number or electronic service address where person was served:

 (2) Time of service: The names, addresses, and other applicable information about persons served is on the Attachment to Proof of Service—Civil (Persons Served) (form POS-040(P)).
6. The documents were served by the following means (specify):
 - a. By personal service. I personally delivered the documents to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

CASE NAME:	CASE NUMBER: BC551887
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6. b. **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses in item 5 and (*specify one*):
- (1) deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
 - (2) placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at (*city and state*): Buena Park, CA
- c. **By overnight delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in item 5. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
- d. **By messenger service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed in item 5 and providing them to a professional messenger service for service. (*A declaration by the messenger must accompany this Proof of Service or be contained in the Declaration of Messenger below.*)
- e. **By fax transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed in item 5. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.
- f. **By electronic service.** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in item 5.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: November 9, 2015

Sungjin Ji

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

(If item 6d above is checked, the declaration below must be completed or a separate declaration from a messenger must be attached.)

DECLARATION OF MESSENGER

- By personal service.** I personally delivered the envelope or package received from the declarant above to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package, which was clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

At the time of service, I was over 18 years of age. I am not a party to the above-referenced legal proceeding.

I served the envelope or package, as stated above, on (*date*):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 11/09/2015

Sungjin Ji

(NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)

SHORT TITLE: Storeplan USA Corp. v. Sammy Son, St. Blue Bridgers Corp.	CASE NUMBER: BC551887
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ATTACHMENT TO PROOF OF SERVICE—CIVIL (PERSONS SERVED)

(This attachment is for use with form POS-040.)

NAMES, ADDRESSES, AND OTHER APPLICABLE INFORMATION ABOUT PERSONS SERVED:

<u>Name of Person Served</u>	<u>Where Served</u>	<u>Time of Service</u>
<i>(If the person served is an attorney, the party or parties represented should also be stated.)</i>	<i>(Provide business or residential address where service was made by personal service, mail, overnight delivery, or messenger service. For other means of service, provide fax number or electronic service address, as applicable.)</i>	<i>(Complete for service by fax transmission or electronic service.)</i>
Daniel S. H. Lee (Lee&Oh) Attorney for Sammy Son and St. Blue Bridgers Corporation	3580 Wilshire Blvd. Suite 1050, Los Angeles, CA 90010	Time: _____
Matthew Seror (Buchalter Nemer) Attorney for Sammy Son and St. Blue Bridgers Corporation	1000 Wilshire Blvd. Suite 1500, Los Angeles, CA 90017	Time: _____
John Lee (Law Offices of Lee & Kim) Attorney for Storeplan USA Corporation.	3731 Wilshire Blvd., Suite 940, Los Angeles CA 90010	Time: _____
Storeplan USA Corporation (Plaintiff)	1111 WILSHIRE BLVD, STE 724 LOS ANGELES CA 90017	Time: _____
		Time: _____