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

Proceeding	92047757
Party	Plaintiff Karen B. Donovan
Correspondence Address	David H.E. Bursik 401 Hamburg Turnpike, Suite 210 Wayne, NJ 07470 UNITED STATES dheb@bursik.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	David H.E. Bursik, Esq.
Filer's e-mail	dheb@bursik.com
Signature	/David H.E. Bursik, Esq./
Date	04/20/2008
Attachments	Notice Of Reliance By Petitioner Upon Deposition Testimony Of Registrant Courtney L Bishop.pdf (4 pages)(1053465 bytes)

A2. Registrant Bishop moved to Indiana in 1985 and has been a resident of the State of Indiana until the present date. Page 11, Lines 7 to 17, and Page 12, Lines 8 to 21.

A3. Registrant Bishop was aware of the use of the Major Taylor name at the Major Taylor Velodrome in the summer of 1990. Page 13, Lines 5 to 8.

A4. After a friend suggested to Registrant Bishop to use the Major Taylor name for a bicycle team, Registrant Bishop researched the name by reading a book about Major Taylor and written by Andrew Ritchie entitled "The Extraordinary Career of a Champion Bicycle Racer." Page 13, Line 15 to Page 16, Line 16.

A5. Registrant Bishop did not ask anyone for permission to use the Major Taylor name. Page 19, Lines 11 to 20.

A6. At the time when Registrant Bishop decided to start using the name Major Taylor, he was aware that Major Taylor had a living descendant. Page 19, Lines 11 to 20.

A7. Registrant Bishop has never had any contact with Major Taylor's descendant Sydney Brown. Page 19, Lines 21 to Page 20, Line 2.

A8. Registrant Bishop first thought of registering a Major Taylor trademark was in 1999 or 2000. Page 28, Lines 7 to 12.

A9. Prior to 1999, Registrant Bishop had heard of the Major Taylor Association using the Major Taylor name. Page 29, Lines 13 to 17.

A10. When Registrant Bishop thought about registering a Major Taylor trademark, Registrant Bishop wanted to find out whom he would need to get permission from. Page 30, Line 23 to Page 31, Line 11.

A11. Registrant Bishop first applied for a Major Taylor trademark in October of 2000. Page 32, Line 21 to Line 23.

A12. Prior to submitting an application for registration to the Trademark Office, Registrant Bishop knew that Major Taylor had a daughter named Sydney Brown. Page 33, Lines 1 to 5.

A13. When Registrant Bishop submitted an application for registration of a Major Taylor trademark, he knew that Major Taylor had been a living person and that he had a living descendant. Page 33, Line 12 to Line 24.

A14. Prior to his submitting an application for registration of a Major Taylor trademark, Registrant Bishop was aware that one or more associations were using a Major Taylor name for civic association work, and that the Velodrome had the Major Taylor name. Page 34, Line 19 to Page 35, Line 6.

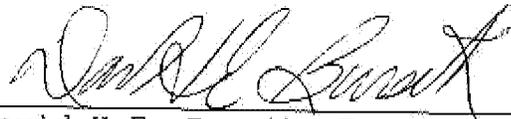
A15. Registrant Bishop is not a blood relative of Major Taylor. Page 37, Line 24 to Page 38, Line 3.

A16. Registrant Bishop never asked permission from any Major Taylor family member to register a Major Taylor trademark. Page 41, Lines 11 to 17.

A17. Registrant Bishop's use of a Major Taylor trademark suggests a connection between him and Major Taylor. Page 43, Line 19 to Page 44, Line 10.

A18. Registrant Bishop heard of the Major Taylor Society in 1999 or 2000. Page 50, Line 22 to Page 51, Line 1.

Date: April 20, 2008



David H.E. Bursik, Esq.
401 Hamburg Turnpike, Suite 210
Wayne, New Jersey 07470
Tel. 1-973-904-1040
Fax. 1-973-904-1050
Email-dheb@bursik.com
Attorney for Petitioner