



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

DALLAS C. BROWN, JR.,	)
	)
Petitioner,	)
	) <b>Cancellation No. 92050965</b>
v.	) Registration No.s: 2791896 and 2701247
	) Mark: MAJOR TAYLOR
COURTNEY L. BISHOP,	)
	)
Respondent.	)

TO: ASSISTANT COMMISSIONER FOR TRADEMARKS  
 United States Patent and Trademark Office  
**Trademark Trial and Appeal Board**  
 P.O. Box 1451  
 Alexandria, VA 22313-1451

**RESPONDENT’S MOTION FOR SUMMARY JUDGMENT UNDER THE DOCTRINES  
OF RES JUDICATA AND COLLATERAL ESTOPPEL**

Comes now Respondent Courtney L. Bishop (hereafter “Respondent”), by counsel, and hereby submits his Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, and pursuant to the judicially-created doctrines of *res judicata* and collateral estoppel, and respectfully requests that Trademark Trial and Appeal Board (hereafter “TTAB”) grant summary judgment in his favor.

As will be demonstrated, there exist no genuine issues of material fact which justify the continued consideration of the present Petition for Cancellation.

**DESIGNATION OF MATERIALS IN SUPPORT OF THE MOTION**

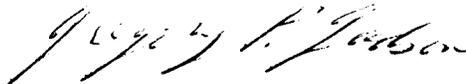
The Respondent hereby designates and relies upon the following in support of his Motion for Summary Judgment:

1. Petition for Cancellation Number 92047757 filed by Karen B. Donovan;

2. January 6, 2009 Decision of the TTAB regarding Petition for Cancellation Number 92047757;
3. The Petitioner's Petition for Cancellation Number 92050965;
4. Transcript of the November 6, 2009 deposition of Dallas C. Brown, Jr.; and
5. Brief in Support of Motion for Summary Judgment.

WHEREFORE, the Respondent respectfully requests that the Board grant summary judgment in his favor, and dismiss the Petitioner's Petition for Cancellation with prejudice.

Respectfully submitted,



---

Gregory P. Gadson, USPTO Atty. Reg. No. 31,354  
19375 Amber Way  
Noblesville, Indiana 46060  
Telephone: (317) 965-9609

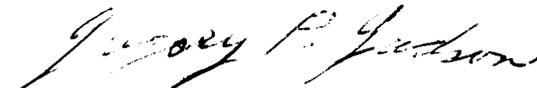
Attorney for Respondent

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies on the 6th day of May, 2010, that the foregoing was served via first class mail, postage prepaid to the following:

David H.E. Bursik, Esq.  
401 Hamburg Turnpike, Suite 210  
Wayne, New Jersey 07470

Theodore E. Kyles, Jr., Esq.  
685 Van Houten Avenue  
Clifton, New Jersey 07013



---

Gregory P. Gadson

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

DALLAS C. BROWN, JR.,	)
	)
Petitioner,	)
	)
v.	) <b>Cancellation No. 92050965</b>
	) Registration No.s: 2791896 and 2701247
COURTNEY L. BISHOP,	) Mark: MAJOR TAYLOR
	)
Respondent.	)

TO: ASSISTANT COMMISSIONER FOR TRADEMARKS  
United States Patent and Trademark Office  
**Trademark Trial and Appeal Board**  
P.O. Box 1451  
Alexandria, VA 22313-1451

**BRIEF IN SUPPORT OF RESPONDENT’S MOTION FOR SUMMARY JUDGMENT  
UNDER THE DOCTRINES OF RES JUDICATA AND COLLATERAL ESTOPPEL**

The Respondent Courtney L. Bishop, by counsel, hereby submits the present Brief in support of his contemporaneously filed Motion for Summary Judgment.

**I. Background and Procedural Summary**

On July 4, 2007, Karen B. Donovan (“Donovan”) filed her Petition for Cancellation Number 92047757, in an attempt to cancel the Respondent Courtney L. Bishop’s (“Bishop’s”) Trademark Registration Numbers 2791896 and 2701247 for the marks “MAJOR TAYLOR.” On January 6, 2009, the Trademark Trial and Appeal Board (“TTAB”) issued a decision dismissing Donovan’s Petition with prejudice, on the grounds that Donovan had failed to demonstrate that she had standing to bring and maintain the Petition. On March 4, 2009, Donovan appealed the TTAB decision to the U.S. District Court for the Southern District of Indiana (Cause No. 1:09-cv-0275-WTL-TAB). That case is still pending.

On May 14, 2009, the Petitioner Gen. Dallas C. Brown, Jr. ("Brown") filed the current Petition for Cancellation Number 92050965. Except for the identity of the Petitioners, their precise relationship to the late Marshall W. "Major" Taylor, and *de minimus* language differences, Brown's Petition is identical to Donovan's. In fact, Brown is Donovan's father, and both Brown and Donovan (in her federal lawsuit) utilize one of the same attorneys for representation.

Brown has been deposed with respect to both the current Petition, and Donovan's aforementioned lawsuit.

## **II. General Standards Regarding Summary Judgment**

Summary judgment is appropriate where the moving party has demonstrated that there is no genuine issue of material fact and that there is a lack of evidence to support the non-moving party's case. See *Celotex Corp. v. Catrett*, 477 U.S. 317, 325 (1986). Once the moving party has demonstrated that no genuine issue of material fact remains for trial, the non-moving party may not merely rest on pleadings to defeat summary judgment, but has the burden of going forward with evidence of a genuine factual dispute. *Id.* at 322-323.

Where it becomes clear that the non-moving party cannot satisfy the legal requirements necessary to sustain its case, summary judgment is mandated. *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986).

## **III. Statement of Material Facts Not in Dispute**

The Respondent respectfully avers that the following facts are both material, and not in dispute:

1. Donovan is a great-granddaughter of the late Marshall W. (“Major”) Taylor, and was authorized at the time she filed her for Petition for Cancellation Number 92047757 with complete authority and responsibility to act on behalf of the estate of the deceased individual Marshall W. (“Major”) Taylor (hereinafter referred to as “Major Taylor”), and to handle all affairs concerning the legacy, persona, memorabilia, records, images, likenesses, endorsements, trademarks, copyrights, and all manner of things related to the deceased individual Major Taylor.  
(Donovan Petition for Cancellation No. 92047757, ¶1).
2. In its January 6, 2009 decision, the TTAB dismissed Donovan’s Petition with prejudice on the ground that she did not have standing.
3. At the time Donovan filed her Petition for Cancellation, and continuing through the decision of the TTAB, Donovan had full consent from Brown to represent him, and complete authority to represent Brown and all other descendants of the late Marshall W. “Major” Taylor, and was therefore Brown’s agent *ad litem*.  
(Brown deposition transcript, page 31, lines 19-25, page 32, lines 13-16, and page 33, lines 20-24).
4. Brown is the sole grandchild of the late Marshall W. “Major” Taylor, and Brown and Donovan are therefore father and daughter, respectively. (Brown Petition for Cancellation No. 92050965, ¶1; Donovan Petition for Cancellation No. 92047757, ¶1).
5. Brown filed the current Petition for Cancellation because he believed the decision of the TTAB with respect to the Donovan Petition was unjust, and he believed that the current Petition for Cancellation was in the nature of an appeal of the

TTAB decision with respect to the Donovan Petition. (Brown deposition transcript, page 34, page 36, page 41, lines 22-25, page 42, and page 43).

#### **IV. Discussion**

##### The Petition is Barred Under the Doctrine of *Res Judicata*

The doctrine of *res judicata* bars a subsequent action of a party or its privy, for the same claim or cause of action that was adjudicated by a tribunal of competent jurisdiction. The purpose behind the rule is to provide finality to judgments for matters adjudicated, and to prevent endless litigation over matters that have been or should have been decided.

The doctrine of *res judicata* is often referred to as the doctrine of claim preclusion. A claim is precluded under the doctrine of *res judicata* when the following tests are met: 1) there is identity of parties (or their privies); 2) there was an earlier final judgment on the merits of a claim; and 3) the second claim is based on the same set of transactional facts as the first. *Jet, Inc. v. Sewage Aeration Syst.*, 223 F.3d 1360, 1362 (Fed. Cir. 2000).

In the present Petition for Cancellation, Gen. Dallas C. Brown is clearly a privy of Karen B. Donovan, both by consanguinity (he is Donovan's father), and by virtue of Brown's full consent to Donovan representing him and other descendants of the late Marshall W. "Major" Taylor in Donovan's Petition for Cancellation. (See Statement of Material Facts Not in Dispute, *supra.*) Donovan was therefore in effect Brown's agent *ad litem*.

The Respondent respectfully requests that the Board take judicial notice of the fact that Donovan's Petition for Cancellation was dismissed with prejudice, and was therefore a final judgment on the merits of Donovan's claim.

The third prong necessary for *res judicata* is also easily met. That is, the second claim (Brown's Petition for Cancellation) also seeks to cancel the same trademark registrations issued to the Respondent, and the grounds for cancellation are identical. In fact, Brown's Petition for Cancellation is almost a verbatim copy of Donovan's Petition. The dismissal of Donovan's Petition with prejudice not only bars Donovan from bringing a subsequent petition to cancel the Respondent's trademark registrations, but also imputes the legal disability to Brown, since he is a clear privy. Only a compelling legal justification would allow Donovan or her privy Brown to bring and maintain the present Petition for Cancellation, and no such reason (nor any reason, for that matter) has been advanced.

The Donovan Petition for Cancellation was filed and pursued by a person (Donovan) having sole authority to represent the heirs of the late Marshall W. "Major" Taylor, and Gen. Brown is a member of the represented group. Allowing Brown to pursue a second Petition for Cancellation involving the same trademark registrations for the same reasons violates the finality of judgment rule, and would encourage endless cancellation petitions for the same marks by the same group of descendants. As an aside, Brown through his agent *ad litem* Donovan is actively pursuing a *de novo* appeal in the United States District Court for the Southern District of Indiana. Brown cannot therefore be heard to complain that he has not had (or does not have) a fair opportunity to pursue the cancellation of the Respondent Bishop's trademark registrations.

Therefore, the present Petition for Cancellation is barred under the doctrine of *res judicata*, and should be prejudicially dismissed.

The Petition is Barred Under the Doctrine of Collateral Estoppel

The Respondent believes he has already demonstrated that the present Petition for Cancellation is barred under the doctrine of *res judicata*. Even if this were not the case, Brown's Petition should also be barred under the doctrine of collateral estoppel as explained below.

The doctrine of collateral estoppel bars a party or its privy from re-litigating issues that have between decided by a tribunal of competent jurisdiction, where the parties in both instances are the same or substantially the same. Collateral estoppel may be thought of as the issue preclusion doctrine, whereas *res judicata* may be thought of as the claim preclusion doctrine. Under the doctrine of collateral estoppel, issues are precluded from being re-litigated when the following conditions are met: 1) the issue to be determined must be identical to the issue involved in the prior action; 2) the issue must have been raised, litigated and actually adjudged in the prior action; 3) the determination of the issue must have been necessary and essential to the resulting judgment; and 4) the party precluded must have been fully represented in the prior action. See *Mother's Restaurant Inc. v. Mama's Pizza, Inc.*, 723 F.2d 1566, 221 USPQ 394, 397 (Fed. Cir. 1983), and *Larami Corp. v. Talk To Me Programs Inc.*, 36 USPQ2d 1840, 1843-1844 (TTAB 1995).

Specifically, the Board decided that with respect to the Donovan Petition, Karen Donovan failed to demonstrate that she had the requisite standing to bring and maintain her Petition for Cancellation. The issue of standing is also one that is inherently involved in maintaining the Brown Petition. Just as the doctrine of collateral estoppel would estop Donovan from re-litigating the standing issue before the TTAB in an attempt to achieve a different result, so too must her privy Brown be likewise estopped.

The issue of standing was not only raised in the Donovan Petition for Cancellation proceedings, but was fully adjudicated, as the record shows. Brown was fully represented in the

first Petition for Cancellation by his agent Donovan for the reasons stated in the section pertaining to *res judicata*. Moreover, it was certainly stated in the Board's decision on the Donovan Petition that standing was an issue necessary for adjudication of the Petition.

As the issue of standing is precluded from being re-litigated, and standing has been adjudged to be lacking, neither Donovan nor her privy Brown have standing to bring and maintain the current Petition. The lack of standing in the Donovan case carries through to the Brown case to relegate the Brown Petition for Cancellation to the same fate: dismissal with prejudice.

#### V. Conclusion

It is clear from the record that the current Petition for Cancellation is barred under the Doctrines of *Res Judicata* and Collateral Estoppel, and should therefore not be sustained. The Respondent believes he is therefore entitled to summary judgment as a matter of law.

WHEREFORE, the Respondent Courtney L. Bishop respectfully requests that the Board grant summary judgment in his favor, and dismiss the Petitioner Dallas C. Brown, Jr.'s Petition for Cancellation, with prejudice.

Respectfully submitted,



---

Gregory P. Gadson, USPTO Atty. Reg. No. 31,354  
19375 Amber Way  
Noblesville, Indiana 46060  
Telephone: (317) 965-9609

Attorney for Respondent

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies on the 6th day of May, 2010, that the foregoing was served via first class mail, postage prepaid to the following:

David H.E. Bursik, Esq.  
401 Hamburg Turnpike, Suite 210  
Wayne, New Jersey 07470

Theodore E. Kyles, Jr., Esq.  
685 Van Houten Avenue  
Clifton, New Jersey 07013



---

Gregory P. Gadson

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

DALLAS C. BROWN, JR.,)  
Petitioner, ) Cancellation No. 92050965  
v. ) Registration No. 2791896  
COURTNEY L. BISHOP,) Registration No. 2701247  
Registrant. ) Marks: Major Taylor

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

KAREN B. DONOVAN, )  
Plaintiff, )  
v. ) Case No. 1:09-CV-0275-WTL-TAB  
COURTNEY L. BISHOP,) )  
Defendant. )

The deposition upon oral examination of  
DALLAS BROWN, JR., a witness produced and sworn  
before me, Sherri L. Segó, Notary Public in and for  
the County of Johnson, State of Indiana, taken on  
the 6th day of November, 2009 at 1:00 p.m. at  
HAMPTON INN, 9020 Hatfield Drive, Indianapolis,  
Indiana, pursuant to the Indiana Rules of Trial  
Procedure. This deposition was taken on behalf of  
Mr. Brown and Ms. Donovan in the above-captioned  
matter.

ASSOCIATED REPORTING, INC.  
Two Market Square Center, Suite 940  
251 East Ohio Street  
Indianapolis, Indiana 46204  
(317) 631-0940

APPEARANCES

FOR MR. DALLAS BROWN and MS. KAREN BROWN DONOVAN:

David H.E. Bursik  
LAW OFFICE OF DAVID H.E. BURSIK  
401 Hamburg Turnpike  
Suite 210  
Wayne, New Jersey 07470

FOR MR. COURTNEY BISHOP:

Gregory P. Gadson  
LEE COSSELL KUEHN & LOVE, LLP  
127 East Michigan Street  
Indianapolis, Indiana 46204

ALSO PRESENT:

Karen Brown Donovan  
Courtney Bishop

INDEX OF EXAMINATION

	Page No.
EXAMINATION	
Questions by Mr. Bursik.....	6
EXAMINATION	
Questions by Mr. Gadson.....	28

EXHIBIT INDEX

For Mr. Dallas Brown and Ms. Karen Brown-Donovan:

Description	Page No.
Exhibit A Notice of Deposition.....	10
Exhibit B Driver's License and United States Uniformed Services Identification Card.....	7
Exhibit C Birth Record for Dallas Coverdale Brown, Jr.....	9
Exhibit D Birth Record for Rita Sidney Taylor.....	10
Exhibit E Certificate of Death for Sidney Taylor Brown.....	10
Exhibit F Certificate of Death for Daisy Taylor.....	11
Exhibit G Certificate of Death for Marshall Taylor.....	11
Exhibit H Descendants Marshall "Major" Taylor Diagram.....	11
Exhibit I Statue Dedication Program...	15
Exhibit J Boulé Journal 72 4.....	16
Exhibit K DVD.....	18
Exhibit L House of Representatives Citation for Sidney Taylor Brown.....	18
Exhibit M Eulogy Document for Sidney Taylor Brown.....	20
Exhibit N Program Document for Statue Dedication for Major Taylor.	21
Exhibit O Will of Sidney Taylor Brown..	19

EXHIBIT INDEX (cont.)

For Mr. Dallas Brown and Ms. Karen Brown-Donovan:

Description	Page No.
Exhibit GG Photograph.....	26
Exhibit HH Photograph.....	26
Exhibit II Photograph.....	26
Exhibit JJ Photograph.....	26

EXHIBIT INDEX (cont.)

For Mr. Dallas Brown and Ms. Karen Brown-Donovan:

Description	Page No.
Exhibit P Biography of Sidney Taylor Brown by David Herndon.....	21
Exhibit Q Post-Gazette 100th Birthday Greetings for Sidney Taylor Brown.....	21
Exhibit R Alpha Kappa Alpha Sorority 100th Birthday Greetings for Sidney Taylor Brown....	22
Exhibit S Wedding Announcement for Rita Sidney Taylor to Dallas C. Brown.....	22
Exhibit T New Pittsburgh Courier 100th Birthday Article for Sidney Taylor Brown.....	22
Exhibit U The Boston Globe Article for Statue Dedication.....	23
Exhibit V Photograph.....	23
Exhibit W Photograph.....	23
Exhibit X Photograph.....	24
Exhibit Y Photograph.....	24
Exhibit Z Photograph.....	24
Exhibit AA Photograph.....	24
Exhibit BB Photograph.....	24
Exhibit CC Photograph.....	25
Exhibit DD Photograph.....	25
Exhibit EE Photograph.....	25
Exhibit FF Photograph.....	25

1 DALLAS COVERDALE BROWN, JR.,  
2 having been first duly sworn to tell the truth,  
3 the whole truth, and nothing but the truth, was  
4 examined and testified as follows:  
5  
6 EXAMINATION,  
7 QUESTIONS BY MR. BURSIK:  
8 Q Good afternoon, General Brown. Greg Gadson to my  
9 left and I are here to ask you some questions  
10 relating to a couple of pending legal matters. We  
11 thank you for traveling out here to Indianapolis  
12 from South Carolina. Greg and I have stipulated  
13 that the questions asked to you today and your  
14 answers subject to any objections as to form are to  
15 be resolved later by a tribunal to be used later in  
16 a court as evidence. So it may avoid the need for  
17 you to travel again some distance, you would not  
18 have to.  
19 Have you ever been deposed before or given  
20 testimony in any type of judicial proceedings?  
21 A Yes.  
22 Q Judicial proceedings, probably a JAG proceeding or  
23 military tribunal proceeding?  
24 A Military proceedings.  
25 Q For the record, would you state your full name.

Page 7

1 A Dallas Coverdale Brown, Jr.  
2 Q And I'll show you a document that's been marked as  
3 Exhibit B. These are just identification  
4 references that Sherri put on them so we know when  
5 we refer to them.  
6 Is that a copy of your driver's license ID and  
7 your military ID?  
8 A And my ID, yeah.  
9 Q General -- is it okay if I refer to you as General?  
10 A Yes.  
11 Q -- when were you born?  
12 A August 21st, 1932.  
13 Q And where were you born?  
14 A New Orleans, Louisiana.  
15 Q And where did you attend school? And I know we  
16 need to speak up sometimes. Feel free at any time  
17 to tell us to speak up.  
18 A All of the schools or what?  
19 Q Where did you attend college? Did you attend  
20 college?  
21 A Yes.  
22 Q Where did you attend college?  
23 A West Virginia State University, West Virginia, and  
24 Indiana University in Bloomington.  
25 Q And what is the name of your mother?

Page 8

1 A Rita Sidney Taylor Brown.  
2 Q And did Rita Sidney Taylor go by any other names?  
3 A Yes. Sidney Taylor Brown.  
4 Q What is the name of your grandfather on your  
5 mother's side?  
6 A Marshall -- I forgot the middle name.  
7 Q You can use the middle initial if you want to use  
8 the middle initial.  
9 A Marshall W.  
10 Q And the last name?  
11 A Marshall W. Taylor.  
12 Q And does Marshall W. Taylor, your grandfather on  
13 your mother's side, go by any other name?  
14 A A pseudonym, Major Taylor.  
15 Q Any idea how he got the name Major Taylor, why  
16 people called him Major Taylor?  
17 A As a child he was riding a bicycle in exhibitions  
18 and his sponsors dressed him up in some fancy  
19 uniform, but he only wore that as a child. Once he  
20 outgrew that, he didn't wear that kind of uniform  
21 again. But the nickname stuck. They called him  
22 Little Major and they kept calling him Major. He  
23 had nothing to do with the military.  
24 Q To the best of your knowledge, do you have any  
25 brothers or sisters?

Page 9

1 A No, I'm an only child.  
2 Q To the best of your knowledge, does your mother,  
3 Sidney Taylor, have any brothers or sisters?  
4 A No, she was an only child.  
5 Q Do you have any military experience?  
6 A Military experience?  
7 Q Yes.  
8 A I'm a retired Army Brigadier General. I have 30  
9 years military experience, peace and war.  
10 Q And when did you retire?  
11 A When?  
12 Q When.  
13 A May 30th, 1984.  
14 Q Congratulations and thank you for your service.  
15 To the best of your knowledge, are you the  
16 closest living blood relative to Major Taylor?  
17 A I'm certain that I'm the closest living relative.  
18 I'm the only one in my generation.  
19 Q I'll show you a document that our court reporter  
20 has identified as Exhibit C and ask you if that  
21 represents a copy of your birth --  
22 A My birth certificate.  
23 Q And that is what that is?  
24 A Yes.  
25 Q Thanks.

Page 10

1 And just for the record, I made Exhibit A a  
2 copy of the notice of deposition that Sherri  
3 marked. And pardon my cough. It's not swine flu.  
4 It's something.  
5 I'll show you a document that's been marked  
6 Exhibit D. Does that represent a copy of the birth  
7 certificate of your mother, Sidney Taylor?  
8 A This is a copy of my mother's birth certificate.  
9 We were fortunate to find it. It was found in  
10 Worcester, Massachusetts. No one knew where it was  
11 for a long time.  
12 THE DEPONENT: You found it, didn't you  
13 Karen?  
14 A That's it.  
15 Q Thank you very much.  
16 I'll show you a document that's been marked as  
17 Exhibit E and ask you if that represents a copy of  
18 the death certificate of your mother, Sidney?  
19 A I'm looking for the date.  
20 Q I don't need the date.  
21 A 11th of May, 1904.  
22 Q I just need to know that that's a copy of her death  
23 certificate. I don't need the date. Somebody can  
24 just look on it to find the date.  
25 Is that a copy of her death certificate,

Page 11

1 Sidney's?  
2 A Well, I found a date of birth, I guess. Thirteen,  
3 May, 2005, yes, that's it.  
4 Q I'll show you a copy of a document that's marketed  
5 Exhibit F and ask if that's a copy of the death  
6 certificate for Daisy Taylor?  
7 A I have no way to verify this.  
8 Q Okay. That's fine. Who was Daisy Taylor?  
9 A I have to assume it's valid.  
10 Q Who was Daisy Taylor?  
11 A My grandmother, my mother's mother.  
12 Q Married to Major Taylor?  
13 A Yes.  
14 Q I'll show you a copy of a document that's marked  
15 Exhibit G and I'll ask you if that's a copy of a  
16 death certificate for Major Taylor?  
17 A Cook County, that's correct, Chicago, June 1932.  
18 That's correct.  
19 Q Now, I'll show you a document that's been marked  
20 Exhibit H and ask you to look at this document and  
21 can you tell us whether that represents an accurate  
22 family tree of your family?  
23 A I think this is a remarkable document. It starts  
24 with Major Taylor through my mother to me, then  
25 from me to my five children, and then below them my

Page 12

1 seven -- seven great-grandchildren -- no -- first  
2 group of my children, the second group of my  
3 grandchildren. So we've got the whole -- we've got  
4 the whole line from Major Taylor down to today, and  
5 there are a lot of them.  
6 Q Congratulations.  
7 A Some of them are doing exceptional things.  
8 Q Can you tell me, why did you file a claim against  
9 Courtney Bishop seeking to cancel the trademark  
10 registration of Mr. Bishop relating to Major  
11 Taylor?  
12 A I felt that the legacy of Major Taylor in all  
13 aspects should be controlled by the family, and I  
14 know my mother would have wanted that. I was  
15 surprised that there was any controversy about  
16 this. I thought it would happen automatically --  
17 Q Is it --  
18 A -- that we would control the trademark.  
19 Q Is it your contention, General, that Mr. Bishop  
20 failed to get permission from the Major Taylor  
21 family for using the Major Taylor trademark in  
22 commerce as required by Indiana law?  
23 MR. GADSON: Objection.  
24 MR. BURSİK: I'm sorry. Not referring to  
25 law. Let me rephrase it.

Page 13

1 Q General, if Mr. Gadson ever has an objection, I'm  
2 going to try my best to try and rephrase it so it  
3 avoids objections so we don't have an issue about  
4 how the question is phrased. I'm going to state it  
5 again, so ignore my last question.  
6 General, is it your contention that Mr. Bishop  
7 failed to get permission from the Major Taylor  
8 family in order to use the Major Taylor trademark  
9 in commerce in the state of Indiana?  
10 A I'm convinced that he did not get permission from  
11 the family. The permission would have to come from  
12 my mother or me, and it didn't.  
13 Q Is it your contention that a statement of  
14 Mr. Bishop in his trademark applications that he  
15 owned the Major Taylor trademark for use in  
16 commerce is a false statement?  
17 A I don't know. I really don't know.  
18 Q Is it your contention that --  
19 A Well, yes.  
20 Q Is it your contention that --  
21 A This is a legal matter.  
22 Q I'm not asking you to answer any legal  
23 characterizations, because we understand that --  
24 A Okay. My contention, yes.  
25 Q We're just asking you as a layperson your

Page 14

1 understanding of things you perceive as a  
2 layperson. So no one is asking you to make any  
3 legal characterizations.  
4 Is it your contention that any statement made  
5 by Mr. Bishop in his application that no one else  
6 had the right to use the Major Taylor name in  
7 commerce was an untrue statement?  
8 A I think it was untrue.  
9 Q And is it your contention, General, that  
10 Mr. Bishop's registration of the Major Taylor  
11 trademarks and using them for commercial purposes  
12 falsely suggests a connection with your  
13 grandfather, Major Taylor?  
14 A That is my contention.  
15 Q Now, do you recall attending an event in May of  
16 2008 in Worcester relating to unveiling a statue  
17 for Major Taylor?  
18 A A statue was dedicated to Major Taylor. What's the  
19 date again there?  
20 Q In May of 2008.  
21 A That's the date. This is the national headquarters  
22 of the Major Taylor Association in Worcester.  
23 There was a big crowd there, cyclists from all over  
24 the country, several hundred people had turned out.  
25 It was a big event in the city. It was covered in

Page 15

1 newspapers all over the country and TV. I spoke.  
 2 Karen spoke. Several of the guests spoke like  
 3 Edwin Moses and some others.  
 4 Q I'll show you a document marked as Exhibit I and  
 5 ask you whether or not this is a copy of the  
 6 program that was distributed at this event?  
 7 A Yes. I remember it was a very nice program.  
 8 Q Can you tell me who is depicted in the photograph  
 9 on the front page of that document?  
 10 A Greg LeMond, three-time Tour de France winner;  
 11 Karen Brown-Donovan, great-granddaughter of Major  
 12 Taylor; Lynne Tolman. Lynne Tolman, I guess she's  
 13 secretary or manager of the Major Taylor  
 14 Association; I was there; Edwin Moses, three-time  
 15 Olympic track and field medalist, and others.  
 16 There were leading bikers that were there. I was  
 17 surprised at the attendance.  
 18 Could I digress to tell a short story?  
 19 Q You certainly can. Go ahead.  
 20 A I had been informed about this statue being  
 21 dedicated several months in advance and I decided  
 22 to go and I was invited by Ms. Tolman. I decided  
 23 to go and I called --  
 24 THE DEPONENT: What was the name of it?  
 25 A -- the Hilton Garden Inn in Worcester and asked for

Page 16

1 reservations for this date or dates. And this is a  
 2 computer and this was two or three weeks before the  
 3 thing started, before it's to be held. And the  
 4 computer said the place is full, no reservations  
 5 available. And I said how could that be? And then  
 6 I thought about it and I looked out the window and  
 7 the street where the motel was located is named  
 8 Major Taylor Boulevard. I mean, the picture of the  
 9 hotel where the thing is located is on Major Taylor  
 10 Boulevard. And then I cried. I said that place is  
 11 full because they're honoring my grandfather.  
 12 THE DEPONENT: You did too when you learned  
 13 that, didn't you?  
 14 Q Thank you for sharing that with us.  
 15 I'll show you a document marked Exhibit J  
 16 relating to that same event and ask you what is the  
 17 Alpha Lamda Boulé that's referred to in that  
 18 document?  
 19 A The Alpha Lamda Boulé is a national fraternal  
 20 organization of successful black professional men.  
 21 Very difficult to get into it, doctors, lawyers,  
 22 dentists, college professors, presidents,  
 23 businessmen, and a few military officers.  
 24 Like other groups, blacks have many  
 25 fraternities and sororities in college. But this

Page 17

1 group is beyond college, so it doesn't matter what  
 2 fraternity you were in college. This is a new one,  
 3 a special one. And it's more significant than the  
 4 others because these are people who have succeeded.  
 5 I think we all know about fraternities and  
 6 sororities in college. You can join and maybe you  
 7 make it, maybe you don't, and maybe that's all you  
 8 do in your life. But this particular group is a  
 9 cut above that, and it's an honor to be selected  
 10 for this.  
 11 Q And is that a program that this group put out at  
 12 that event, too?  
 13 A And the chapter I belong to, someone read about  
 14 Major Taylor and decided to write an article and  
 15 put it in a Boulé journal. This is a monthly  
 16 journal.  
 17 Q So that's what this is an exert from?  
 18 A Yes.  
 19 Q Okay, thanks.  
 20 A I was surprised that they printed it because Major  
 21 Taylor wasn't in the Boulé. I don't know if they  
 22 even had it then. But they printed it because he's  
 23 my relative and they wanted a reason to put someone  
 24 like him in there, I guess.  
 25 Q I'm going to show you a copy of a DVD, the cover of

Page 18

1 which has been marked Exhibit K, and I'm going  
 2 to --  
 3 A Can you play it?  
 4 Q I'm going to make a copy, one for you to take and  
 5 I'll make a copy, Mr. Bishop, for you so you --  
 6 A And one for you, if you will.  
 7 Q And one for you.  
 8 This relates to a July 28, 1996 NBC Olympics  
 9 interview. Do you recall participating in that  
 10 interview?  
 11 A Yes.  
 12 Q I'm going to --  
 13 A They interviewed me and my mother.  
 14 MR. BURSİK: Then we're going to -- we'll  
 15 circulate copies to everyone so they have it  
 16 because the visual can't be incorporated into the  
 17 two-dimensional. So we'll just make it an exhibit,  
 18 but everyone here is going to get one.  
 19 Q I'll show you a document marked Exhibit L and ask  
 20 you if this is a copy of a Pennsylvania House of  
 21 Representatives citation that was given to your  
 22 mother?  
 23 A Yes. I find this striking because a senator or a  
 24 representative has to start this, and I don't know  
 25 who or how this was done. In other words, we, the

Page 19

1 family, had nothing to do with it. She had  
 2 sufficient standing of value in the state to have  
 3 this done. It's quite impressive.  
 4 Q Have you --  
 5 A It's a citation for the Commonwealth of  
 6 Pennsylvania House of Representatives citation for  
 7 her achievements.  
 8 Q Have you ever had an opportunity prior to today to  
 9 meet Mr. Courtney Bishop, who is here with us  
 10 today?  
 11 A No.  
 12 Q Have you had an opportunity to read books  
 13 concerning your grandfather, Major Taylor?  
 14 A I think I've read all of them.  
 15 Q Including the autobiography, The Fastest Bicycle  
 16 Rider in the World?  
 17 A Yes.  
 18 Q And the Andrew Ritchie book?  
 19 A Ritchie's book and Major Taylor's own book.  
 20 Q I'll show you a document marked Exhibit O and ask  
 21 you if that's a copy of the will of your mother,  
 22 Sidney Taylor Brown?  
 23 A Yes, this is her will.  
 24 Q And were you named as a beneficiary in her will?  
 25 A She gave -- she made me her sole beneficiary with

Page 20

1 an exception that the executor provide first choice  
 2 to my ex-wife of such property, property not to  
 3 succeed \$2500. Everything else is left to me and I  
 4 paid, of course, my ex-wife \$2500. I don't know  
 5 whether there's any material things worth \$2500  
 6 left.  
 7 Q Thank you.  
 8 A This aside, but I think my mother was robbed in the  
 9 hospital -- the nursing home.  
 10 Q I'm sorry to hear that.  
 11 A I don't mean by someone breaking in, I mean by  
 12 employees, because I gave her gifts every occasion  
 13 and I never saw any of them again.  
 14 Q I'm sorry to hear that.  
 15 Following the --  
 16 THE DEPONENT: You noticed that, too, didn't  
 17 you?  
 18 Q Following the passing of your mother in 2005, I'll  
 19 show you a document marked Exhibit M and ask if  
 20 that's a copy of a eulogy document related to her  
 21 memorial service?  
 22 A Yes, it was a nice eulogy. It was a nice memorial  
 23 service. I was a little hurt because the  
 24 attendance was only about 60, 70 people. But I've  
 25 learned since then that as people get older when

Page 21

1 they die, there aren't that many people there.  
 2 When young people die the place is full. When  
 3 they're older there are only a few. But frequently  
 4 we go to funerals today and it's always the same  
 5 thing. People who are outstanding citizens and  
 6 high achievers, but only a few of the attendees are  
 7 left. It's a fact of life.  
 8 Q Unfortunate, but it's true.  
 9 I'll show you a document marked Exhibit P and  
 10 ask you if this was a biography about your mother  
 11 prepared by David Herndon at the time of her death?  
 12 A Oh, yes, and this is a good one. It's a distinct  
 13 summary of her life.  
 14 Q I'll show you another document marked Exhibit N and  
 15 ask you if this is a program document prepared by  
 16 the Major Taylor Association in conjunction with  
 17 that Worcester, Massachusetts statue dedication?  
 18 A Yes, I remember this. This is one of the better  
 19 ones. And here, this is a picture of the monument  
 20 on the cover disseminated all over the country.  
 21 Q I'll show you a document marked Exhibit Q and ask  
 22 you if this is a copy of an excerpt from the  
 23 Pittsburgh Post Gazette from the May 19, 2004 issue  
 24 that relates to the 100th birthday of your mother?  
 25 A Yes. Again, a good summary of her life.

Page 22

1 Q I'll show you a document marked Exhibit R and ask  
 2 you if this is another excerpt from the Pittsburgh  
 3 Post Gazette, May 20th, again, concerning the 100th  
 4 birthday of your mother?  
 5 A This is celebrating her 100th birthday and it's her  
 6 sorority, Alpha Kappa Alpha. She is a Diamond  
 7 Soror. I don't know whether that's how many years  
 8 of memory or years of life, but that's the highest  
 9 award that they give. It's the highest honor for  
 10 somebody that dies. I guess if you live to be a  
 11 hundred, you get one of these.  
 12 Q That's it, there you go, a watch.  
 13 I'll show you a document marked Exhibit S and  
 14 ask you if this is a copy of the marriage  
 15 announcement for your mother to your father?  
 16 A Yes.  
 17 Q And I'll show you a document marked Exhibit T,  
 18 which is a newspaper page A2 from the May 23, 2004  
 19 issue of the New Pittsburgh Courier and ask you if  
 20 that paper relates to the 100th birthday issue of  
 21 your mother -- 100th birthday party for your  
 22 mother?  
 23 A Not the whole paper, but the whole page.  
 24 Q Just this page, right.  
 25 Do you see a picture of you with your mother

1 there under the words "100 is Wonderful"?

2 A I don't think that's me.

3 Q No, this one right here (indicating)?

4 A I thought you were talking about this one

5 (indicating).

6 Q No.

7 A This one is me and this is her with her sorors

8 (indicating).

9 Q I'll show you a document marked Exhibit U, a

10 newspaper, Boston Globe, May 22, 2008 page, B6, and

11 ask you if that picture -- who is in this picture

12 that is on that page?

13 A That's Edwin Moses again and me at the dedication

14 of the monument in the Boston Globe. Actually,

15 this was in newspapers all over the country, some

16 as far away as South Carolina.

17 Q I'll show a photograph marked Exhibit V.

18 Can you identify who is in that photograph?

19 A This is Major Taylor and my mother. I can identify

20 him because I've seen enough pictures of him where

21 I can identify him clearly. And this is her, just

22 much younger.

23 Q I'll show you a photograph marked Exhibit W and ask

24 you who is in that photograph.

25 A This is my first wife, Joyce, my mother holding me,

1 and I'm an infant, I'm guessing three, four months,

2 and then my grandmother, Daisy Taylor, standing

3 there -- sitting there.

4 Q I'll show you a photograph, Exhibit X. Can you

5 tell me who's in that photograph?

6 THE DEPONENT: This is Daisy Taylor and must

7 be me.

8 A I don't look too happy there. I look sort of

9 belligerent. Maybe I was hungry.

10 Q I'll show you a photograph, Exhibit Y. Can you

11 tell me who's in that photograph.

12 A That's Daisy Taylor again and me. I'm a little

13 happier there.

14 Q I'll show you Exhibit Z, a photograph. Who is in

15 that, please?

16 A That's my father and mother when they were very

17 young. I mean, I guess they were recently married

18 or engaged or something.

19 Q I'll show you a photograph, Exhibit AA. Can you

20 tell me who's in that?

21 A My mother, my grandmother, and I think that's Major

22 Taylor.

23 Q I'll show you a photograph, Exhibit BB, and ask you

24 who's in that.

25 A This is the 100th birthday party that we've been

1 discussing. I'm sitting beside my mother there at

2 the table, at the main table. She enjoyed that.

3 She obviously enjoyed that. I'm glad we did it.

4 Q I'll show you photograph Exhibit CC. Is that the

5 same event?

6 A Same event.

7 Q Who's in that photograph?

8 A My wife sitting beside my mother and I'm standing

9 beside her. I guess that's Dallas there and then

10 my son's wife. You've got most of the family there

11 for this one.

12 Q And I'll show you Exhibit DD and ask you who's in

13 that.

14 A My mother sitting at a table looking at her

15 birthday cake, my wife, my son's wife, my first

16 son's wife, and their baby daughter.

17 Q I'll show you EE. I don't need to know everybody

18 in it. But both you and your mother appear in

19 Exhibit EE, the photograph?

20 A Yes. My mother's there, I'm there.

21 Q With other friends and family?

22 A And these were some of her Pittsburgh friends. I

23 don't know whether they're in the sorority or not.

24 Q I'll show you Exhibit FF and ask you to identify

25 who's in that photograph.

1 A About 1995 my wife and I took my mother from

2 Pittsburgh to Cleveland to meet my wife's mother.

3 This is a picture in Cleveland in my

4 mother-in-law's condominium. This is a picture of

5 me and my mother.

6 Q I'll show you a Photograph GG --

7 A This is the same trip in my mother-in-law's

8 condominium of my mother, me and my wife's mother,

9 my mother-in-law. They got to be good friends. We

10 were fortunate. They've passed on, both, but they

11 got to be good friends while they were alive and

12 happy to see us married.

13 Q That's good. Can you identify who's in photograph

14 Exhibit HH?

15 A My mother, that's my wife Betty, and Betty's

16 mother, the three of them in the house in

17 Cleveland.

18 Q Can you identify Photo II, Exhibit II?

19 A The same three, Betty, her mother and my mother.

20 Q And Photograph JJ, can you identify who's in that?

21 A This is a 90th birthday party in 1994. Now, who do

22 we have here. We've got my second son Greg, and

23 his three children, and his wife, me, and my

24 mother.

25 THE DEPONENT: Have you seen this before?

Page 27

1 Q Just procedure-wise, just answer Greg or me. You  
2 can ask Karen later.  
3 A Okay.  
4 MR. GADSON: It's a closed-book exam,  
5 General.  
6 THE DEPONENT: Some of them surprise me.  
7 Q At the 2005 funeral for your mother, did a number  
8 of Major Taylor's descendants attend that funeral?  
9 A Most of them. Not all of them.  
10 Q And how about --  
11 A My children are scattered. They live in various  
12 places all over the country. Hard to get them all  
13 together at one time for various reasons.  
14 Q For the 100th birthday party in 2004, did a number  
15 of Major Taylor descendants and family attend that  
16 event?  
17 A Yes.  
18 Q And you're the head of that family as of that point  
19 and time apart from your mother?  
20 A Correct.  
21 Q To the best of your knowledge, has the Major Taylor  
22 family ever objected to anyone making charitable  
23 use in references to Major Taylor?  
24 A No.  
25 Q To the best of your knowledge, has the Major Taylor

Page 28

1 family ever objected to anyone making civic or  
2 public interest use?  
3 A No.  
4 Q To the best of your knowledge, has the Major Taylor  
5 family ever objected to anyone making nonprofit use  
6 or reference for Major Taylor?  
7 A No. We encourage it. I encourage that.  
8 MR. BURSIK: No further questions.  
9 MR. GADSON: Hi, General Brown. I'm Gregory  
10 Gadson here again. I want to thank you for your  
11 service to the country. You have a few  
12 accomplishments in your own right, even though  
13 we're here talking about Marshall Major Taylor. I  
14 have a few questions for you.  
15  
16 EXAMINATION,  
17 QUESTIONS BY MR. GADSON:  
18 Q There was a family tree chart that you spoke about  
19 earlier in your testimony today.  
20 Did you prepare that family tree?  
21 A I didn't understand the question.  
22 Q Let's go back. Exhibit H, I believe --  
23 A My hearing is off anyway.  
24 Q I'll speak louder.  
25 This is marked Exhibit H.

Page 29

1 A Your question was did I prepare that?  
2 Q Yes, sir.  
3 A No, I did not.  
4 Q Who prepared that, to your knowledge?  
5 THE DEPONENT: Did you prepare it?  
6 MR. BURSIK: You're not supposed to ask  
7 questions to her. If you don't know, you can tell  
8 him that.  
9 Q Is your testimony that you don't know where that  
10 chart came from?  
11 A It came from my daughter.  
12 Q So you received it from your daughter Karen  
13 Donovan; is that correct?  
14 A Yes.  
15 Q And did that chart receive any input from you to be  
16 made or was it just given to you?  
17 A I didn't know it was made, but I studied it and  
18 it's accurate. It's very good. She tied Major  
19 Taylor and his descendants together. I hadn't seen  
20 this done before.  
21 Q As far as you know, did Major Taylor leave a will  
22 when he died?  
23 A I don't know whether he did or not.  
24 Q And just for the record --  
25 A I never saw a will from Major Taylor.

Page 30

1 Q General Brown, as far as you know, where did Major  
2 Taylor die?  
3 A Chicago, Cook County Hospital, I believe.  
4 Q So it wasn't in Indiana? So he did not die in  
5 Indiana; is that correct?  
6 A To the best of my knowledge he died in Chicago.  
7 Q And as far as you know, and you certainly should  
8 know the answer to this, where did your mother,  
9 Sidney, die?  
10 A Pittsburgh, Pennsylvania.  
11 Q So did either your grandfather, Marshall Major  
12 Taylor, or your mother have any connection with the  
13 state of Indiana when they died?  
14 A I don't know. My mother, obviously, had a  
15 connection with the Velodrome because she donated  
16 things to it, visited it, gave them advice, I  
17 guess, authorization. As far as my grandfather's  
18 concerned, I don't know of any connection he had.  
19 Q Let me ask you a question, General Brown, about  
20 your trademark cancellation proceeding.  
21 You are aware that this is a second trademark  
22 cancellation proceeding with respect to Major  
23 Taylor. Right?  
24 A Yes.  
25 Q If I read you a statement from Ms. Karen Brown's

Page 31

1 cancellation, I'd like your reaction. This is from  
 2 Ms. Karen Donovan's petition for cancellation.  
 3 It says: Petitioner is an individual and  
 4 resident of the state of Hawaii.  
 5 Do you agree with that?  
 6 A Yes.  
 7 MR. BURSIK: At the time it was made?  
 8 Q At the time it was made, as far as you know, this  
 9 is an accurate statement. Right?  
 10 A Yes.  
 11 Q And it says: With a residential address of 51 --  
 12 A Betty (phonetic) Place.  
 13 Q Honolulu, Hawaii 96818.  
 14 As far as you know, is that accurate?  
 15 A Yes, that's correct.  
 16 Q Petitioner is a great-granddaughter of Marshall W.  
 17 Major Taylor?  
 18 A Yes.  
 19 Q And is authorized with complete authority and  
 20 responsibility to act on behalf of the estate of  
 21 the deceased individual, Marshall W. Major Taylor,  
 22 herein after referred to as Major Taylor.  
 23 Is that an accurate statement?  
 24 A Yes.  
 25 Q And it goes on: And to handle all affairs

Page 32

1 concerning the legacy persona, memorabilia,  
 2 records, images, likenesses, endorsements,  
 3 trademarks, copyrights, and all manner of things  
 4 relating to the deceased individual, Major Taylor.  
 5 Do you agree with that statement?  
 6 A Uh-huh.  
 7 Q Now, this is basically saying that Karen Donovan  
 8 had the complete authority to handle everything  
 9 related to the trademark matters; is that correct?  
 10 MR. BURSIK: I object to your  
 11 mischaracterization. It says what it says.  
 12 MR. GADSON: I want his opinion.  
 13 Q Did Karen Donovan have complete authority to handle  
 14 all of the Major Taylor trademark matters?  
 15 A That was my intention, but the trademark group  
 16 ruled that she did not have sufficient standing.  
 17 Q I'm sorry. I don't want to cut you off, but I'm  
 18 trying to get you to answer just what I'm asking  
 19 you.  
 20 Did she have complete authority to act on  
 21 behalf of the family members with regard to  
 22 trademark matters?  
 23 MR. BURSIK: Before you answer, to the  
 24 extent you're calling for him to make a legal  
 25 characterization, I object. To the extent you're

Page 33

1 asking a lay question, you can give your  
 2 understanding as you know it as a layperson, that's  
 3 fine.  
 4 MR. GADSON: Okay. I use the word  
 5 authority.  
 6 MR. BURSIK: Which is a legal connotation.  
 7 He can tell you what his understanding is, I have  
 8 no problem with that.  
 9 MR. GADSON: Well, I think the word  
 10 authority is an English word that has sometimes a  
 11 legal meaning but it can have lay meanings as well.  
 12 MR. BURSIK: Right. So as far as lay  
 13 meanings, I have no problem.  
 14 MR. GADSON: I want him to answer in terms  
 15 of his understanding of the word authority.  
 16 MR. BURSIK: That's fine, but not as a legal  
 17 characterization.  
 18 MR. GADSON: That's fine.  
 19 A Are you asking me what my intent was?  
 20 Q No. Is it your testimony that Karen Donovan had  
 21 complete authority to act on behalf of the family  
 22 members of Major Taylor in the first trademark  
 23 cancellation proceeding?  
 24 A Yes.  
 25 Q All right. And you have filed a second trademark

Page 34

1 cancellation proceeding; is that right?  
 2 A Yes.  
 3 Q Why have you filed the second proceeding?  
 4 A Because I felt that our family is entitled to  
 5 control the legacy of Major Taylor.  
 6 Q So did you --  
 7 A I felt our family was mistreated.  
 8 Q I see. Did you just want another bite at the  
 9 apple?  
 10 MR. BURSIK: Objection to form.  
 11 A Another bite of the apple?  
 12 Q Did you not another opportunity to bring a case --  
 13 A I wanted to see justice done and fair play.  
 14 Q But when you lost the first time, you did not  
 15 lose --  
 16 MR. BURSIK: He did not lose the first time.  
 17 He was not a party to the first action. So I  
 18 object to your saying when you lost the first time.  
 19 Q When the family members were unsuccessful  
 20 through --  
 21 MR. BURSIK: I object to that.  
 22 MR. GADSON: Let me finish.  
 23 MR. BURSIK: Okay. Go ahead.  
 24 Q When the family members through Karen Donovan were  
 25 unsuccessful in the first cancellation proceeding,

Page 35

1 did you file the second one because you wanted  
 2 another opportunity?  
 3 MR. BURSIK: Don't answer that because it  
 4 mischaracterized who filed the action. It wasn't  
 5 family members.  
 6 MR. GADSON: Family members through Karen.  
 7 MR. BURSIK: The plaintiff is not family  
 8 members.  
 9 MR. GADSON: Well, the petition says she had  
 10 complete authority.  
 11 MR. BURSIK: Correct.  
 12 MR. GADSON: And General Brown agreed with  
 13 that.  
 14 MR. BURSIK: I agree with that, too. But  
 15 that doesn't mean that the family members are  
 16 filing through her. That means she had authority  
 17 to do what she did.  
 18 MR. GADSON: All right. I'll rephrase the  
 19 question.  
 20 Q After Karen Donovan was unsuccessful with the first  
 21 cancellation proceeding, did you, Mr. -- General  
 22 Brown, did you file the new cancellation proceeding  
 23 to have another attempt?  
 24 MR. BURSIK: I object. Don't answer that.  
 25 Another attempt implies he had the first

Page 36

1 attempt. He was not a party to the first  
 2 proceeding.  
 3 MR. GADSON: Okay. Let's rephrase that  
 4 again.  
 5 Q Did you, General Brown, file this trademark  
 6 proceeding because Karen Donovan was unsuccessful?  
 7 A Yes.  
 8 Q And if you are unsuccessful with this current  
 9 action, would you then encourage another family  
 10 member to file a cancellation proceeding?  
 11 MR. BURSIK: Don't answer that. It's a  
 12 hypothetical. It's a hypothetical that some other  
 13 person's going to file another proceeding. He's  
 14 not an expert witness.  
 15 A It would depend on the circumstances.  
 16 MR. GADSON: Just a minute.  
 17 Mr. Bursik, I allowed you wide latitude and  
 18 I didn't object on direct examination.  
 19 MR. BURSIK: Answer the question, but I'll  
 20 reserve my objection to later argument --  
 21 MR. GADSON: I can rephrase it, if you want.  
 22 MR. BURSIK: Okay. Go ahead.  
 23 A It would depend on the circumstances. Look, I'm  
 24 interested in justice. I don't understand what you  
 25 mean by another bite at the apple.

Page 37

1 Q And by "justice," is it your contention that nobody  
 2 outside of a blood relative should be able to use  
 3 Major Taylor as a trademark?  
 4 MR. BURSIK: Commercially, you mean?  
 5 A With the permission of a blood relative.  
 6 MR. GADSON: The question stands as is.  
 7 Q What's your answer, sir?  
 8 A With the permission of a blood relative.  
 9 Q I didn't ask you with their permission or not.  
 10 Is it your contention that nobody outside of  
 11 the family of Major Taylor should be able to use a  
 12 Major Taylor trademark?  
 13 MR. BURSIK: He answered. His answer  
 14 stands. If you ask the same question again, I'll  
 15 allow him to answer it again, but that's the same  
 16 question you asked before and he did respond to  
 17 that question.  
 18 MR. GADSON: I'm asking the same question.  
 19 MR. BURSIK: Sure.  
 20 Q Is it your intention --  
 21 MR. BURSIK: You can answer it again.  
 22 MR. GADSON: I'd like to get my question out  
 23 there.  
 24 Q General Brown, is it your contention that nobody  
 25 outside of the family of Major Taylor should be

Page 38

1 allowed to use the Major Taylor trademark  
 2 commercially?  
 3 MR. BURSIK: You can answer that.  
 4 A Yes, that's my contention at this point.  
 5 Q All right. Is it your contention that nobody  
 6 should be allowed to use the Major Taylor trademark  
 7 -- the Major Taylor name in a noncommercial manner  
 8 without family permission?  
 9 A Noncommercial manner?  
 10 Q Yes.  
 11 A It doesn't matter.  
 12 Q But my question is --  
 13 A I mean, it doesn't matter whether they use it or  
 14 not in a noncommercial way.  
 15 Q It doesn't matter. So --  
 16 A We've given people permission to do that  
 17 repeatedly.  
 18 Q So is it your belief or contention that if anybody  
 19 uses the name Major Taylor, it should be with the  
 20 permission of the family?  
 21 A In a noncommercial manner, it doesn't matter  
 22 whether they use it or not. They use it all the  
 23 time.  
 24 Q But my question to you is: Should anyone using  
 25 Major Taylor as a trademark in any capacity, should

1 they have to get the permission of family members?  
 2 A To use that trademark?  
 3 Q Is that your opinion?  
 4 MR. BURSIK: Can I object to the form?  
 5 Because you've been good about differentiating  
 6 commercial and noncommercial. But this last  
 7 question are you intending not to make that  
 8 differentiation? Because it has -- you've been  
 9 differentiating in all your --  
 10 MR. GADSON: I'm not making the  
 11 differentiation. But I want to get my questions  
 12 out. You'll have your chance for redirect. So if  
 13 you object and you're instructing him not to  
 14 answer, that's fine.  
 15 MR. BURSIK: Only as to form. Go ahead.  
 16 MR. GADSON: This is my opportunity.  
 17 MR. BURSIK: Go ahead.  
 18 MR. GADSON: Now, I understand that if you  
 19 object, that you have the right to object. But I  
 20 want my questions answered, not your questions.  
 21 MR. BURSIK: Okay. You can answer that  
 22 question. My objection as to form stands. You can  
 23 answer that.  
 24 MR. GADSON: Are you instructing him not to  
 25 answer?

1 MR. BURSIK: No, because I can ask a judge  
 2 to rule that this question was ambiguous or  
 3 whatever he answers we don't know what the answer  
 4 is he's responding to.  
 5 So you can still answer it, but I object to  
 6 it.  
 7 Q You can answer this with a yes or no, General  
 8 Brown.  
 9 Is it your contention that for anyone to use  
 10 Major Taylor as a trademark in any capacity, they  
 11 should have to get permission from the family of  
 12 Major Taylor?  
 13 A Trademark in a commercial role?  
 14 Q Yes or no to my question.  
 15 A I don't understand the question. It's not clear.  
 16 Q For any -- to use the Major Taylor name as any  
 17 trademark --  
 18 A They should get permission. If it's noncommercial  
 19 use, they can have it. That should be clear.  
 20 Q What do you define as commercial use?  
 21 A Making money.  
 22 Q Is a foundation a commercial use?  
 23 A Yes.  
 24 Q So if -- so any foundation using the words Major  
 25 Taylor Foundation would need, you believe,

1 permission from the family members?  
 2 A Yes.  
 3 Q If the foundation did not receive -- gave away all  
 4 the money that it received, would it still need the  
 5 family's permission?  
 6 A That's a hypothetical. I can't answer that. If a  
 7 foundation gave away all the money, what would  
 8 happen? I don't know.  
 9 Q Would it matter to you?  
 10 A Huh?  
 11 Q Would you matter to you whether they got your  
 12 permission?  
 13 A Yes, I'm interested in a foundation. I hope one is  
 14 -- one that has been started, I hope it's  
 15 successful and works. But I wouldn't approve any  
 16 foundation just because it's a foundation. I'm not  
 17 a businessman, but I do understand these  
 18 organizations and I belong to several organizations  
 19 and contribute. And others, well, they're not very  
 20 good. So I'd have to judge a foundation case by  
 21 case.  
 22 Q Prior to Ms. Karen Donovan filing her cancellation  
 23 proceeding, did you talk to her about the -- about  
 24 filing the petition?  
 25 A Yes.

1 Q And did you tell her that you agreed that she had  
 2 complete authority?  
 3 A Complete authority to do what?  
 4 Q To act on behalf of the family.  
 5 MR. BURSIK: I object to form. That's not  
 6 what the complaint says.  
 7 MR. GADSON: That's my question, though.  
 8 MR. BURSIK: Okay. With that qualification.  
 9 A I don't understand the question.  
 10 Q Did you have a discussion with Karen Donovan prior  
 11 to her filing her cancellation proceeding in which  
 12 you agreed that she could act on behalf of the  
 13 family?  
 14 A Didn't you ask me that before?  
 15 Q Regardless of whether you think I asked it before,  
 16 General, I'm asking it now.  
 17 A Yes, I did.  
 18 Q You filed another petition for cancellation.  
 19 Can you explain why if she had complete  
 20 authority you then filed the second?  
 21 A Because it didn't work and I felt we didn't get  
 22 justice. I didn't agree with the ruling. In most  
 23 court cases that I'm familiar with we have rights  
 24 of appeal. This is in essence an appeal.  
 25 Q You believe your second cancellation proceeding was

1 an appeal of the first one?  
 2 A You're paraphrasing words. The two are different.  
 3 Q When you filed a petition for cancellation, is that  
 4 correct, sir?  
 5 A Right.  
 6 Q Did you believe when you filed that petition for  
 7 cancellation you were appealing the first petition  
 8 for cancellation?  
 9 MR. BURSİK: He just answered that when he  
 10 said the two were different.  
 11 MR. GADSON: No. I don't have an answer to  
 12 the --  
 13 MR. BURSİK: Do you want her to read it  
 14 back?  
 15 MR. GADSON: I'm going to ask him now. No.  
 16 A I felt I was correcting an error.  
 17 Q Correcting an error?  
 18 A The question goes to standing, Karen's standing  
 19 versus my standing. The court decided Karen didn't  
 20 have standing or sufficient standing, probably  
 21 because she has siblings. But I obviously have  
 22 standing and I think I've proved it, and I'm the  
 23 only one who has standing because I'm the closest  
 24 living relative, blood relative.  
 25 Q So are you prepared to make a discussion about the

1 concepts of standing, General Brown?  
 2 A No.  
 3 MR. BURSİK: Objection. Legal question.  
 4 MR. GADSON: Well, he gave a legal answer.  
 5 MR. BURSİK: His layman's understanding of  
 6 it.  
 7 MR. GADSON: Right. But standing is a lot  
 8 more complicated than blood relatives. Standing  
 9 can be by contract, it can be by agreement, and  
 10 other possible --  
 11 A I think I have standing.  
 12 Q I'm going to read you something out of the federal  
 13 case that Ms. Donovan as filed.  
 14 A This is Karen's case?  
 15 Q Yes, sir. This is her federal case appealing the  
 16 cancellation, the decision in the trademark trial  
 17 and appeal board.  
 18 It says, and I quote, Paragraph 21,  
 19 Registrant's use and registration of Major Taylor  
 20 trademarks falsely suggest a connection with Major  
 21 Taylor.  
 22 Do you think that's the case?  
 23 A I'm certain it's the case. There is no connection  
 24 between Major Taylor and Mr. Bishop.  
 25 Q And does it suggest a false connection simply

1 because he registered the trademark and he's not  
 2 related?  
 3 A I think so.  
 4 Q So if Mr. -- if someone starts a bicycling club and  
 5 they call it the Major Taylor Club, does that  
 6 suggest a false connection with Major Taylor?  
 7 A Depending on the case. It depended on the  
 8 situation.  
 9 Q It's the same use of the name.  
 10 MR. BURSİK: Is that a question? That's not  
 11 a question. Don't answer.  
 12 Q You said it depends on the case.  
 13 If someone uses the name Major Taylor --  
 14 A If it's established to make money --  
 15 Q -- and they're not related, is it a false  
 16 connection?  
 17 MR. BURSİK: Can you let him answer?  
 18 MR. GADSON: I'm asking a new question.  
 19 MR. BURSİK: A new question?  
 20 Q If someone uses the name Major Taylor and they  
 21 haven't gotten permission to use it, is it false --  
 22 does it suggest a false connection with Major  
 23 Taylor.  
 24 A It depends on how it was used.  
 25 Q So a yes --

1 A How the name was used.  
 2 Q There was no answer. What's your belief?  
 3 MR. BURSİK: He answered.  
 4 A In this case the name was used for a profit, and  
 5 that's what I object to.  
 6 Q So it's what you object to. But does it suggest a  
 7 connection with Major Taylor when someone wants to  
 8 use the name and they use the name and they don't  
 9 get permission from the family?  
 10 MR. BURSİK: Could you restate that  
 11 question? I didn't understand that question. Can  
 12 you read that back?  
 13 (Question read.)  
 14 MR. BURSİK: That's your question?  
 15 MR. GADSON: Yes. I'm asking a yes or no  
 16 question -- I'm calling for a yes or no answer.  
 17 MR. BURSİK: Do you understand that  
 18 question?  
 19 THE DEPONENT: No, and I'm reasonably  
 20 cognizant.  
 21 MR. BURSİK: If you say you understand it,  
 22 I'll allow you to answer. I don't understand it.  
 23 But if you say you understand it, I'll allow you.  
 24 But I don't understand that question.  
 25 MR. GADSON: Mr. Bursik, you're not the

Page 47

1 deponent here. General Brown is and --  
2 MR. BURSİK: I gave him instruction. If he  
3 understood that question, then he can respond to  
4 it.  
5 MR. GADSON: But I don't need coaching from  
6 you as to whether he understands that or not. It's  
7 up to him to indicate whether he --  
8 MR. BURSİK: You can ask him if he  
9 understood it.  
10 Q If someone uses the name Major Taylor in any  
11 capacity and they don't get permission from the  
12 family, does that suggest a false connection with  
13 Major Taylor?  
14 A If it is an attempt to make money. If it is a  
15 commercial enterprise. Like this group in  
16 Bloomington or wherever it is. Mr. Bishop's group  
17 or groups, that's what we're talking about.  
18 MR. GADSON: What I'd like to do now is take  
19 a short recess.  
20 A Selling materials, that sort of thing.  
21 MR. GADSON: I'd like to take a short recess  
22 and I'll have more questions.  
23 MR. BURSİK: Sure, sure.  
24 A A voluntary bicycle club, what difference would it  
25 make?

Page 48

1 MR. GADSON: So we'll go off the record now.  
2 MR. BURSİK: Sure. Absolutely.  
3 (Off the record.)  
4  
5 EXAMINATION, (continued)  
6 QUESTIONS BY MR. GADSON:  
7 Q We're back, General Brown. I don't have a lot more  
8 to ask you. I have a few more, so bear with me.  
9 Okay?  
10 Were you aware that Mr. Bishop was using --  
11 when did you become aware that Mr. Bishop was using  
12 the Major Taylor name?  
13 A I don't remember. I don't remember the date or the  
14 year even.  
15 Q Could it have been prior to the year 2000?  
16 A Huh?  
17 Q Could it have been prior to the year 2000?  
18 A I don't know. I'm not being evasive. I just don't  
19 know. I don't remember.  
20 Q Fair enough.  
21 A My daughter told me about it.  
22 MR. BURSİK: Just speak about what you  
23 remember.  
24 MR. GADSON: Well, I can --  
25 MR. BURSİK: Or you can ask him if you want.

Page 49

1 A I don't remember the date.  
2 Q What did your daughter say to you?  
3 A Huh?  
4 Q What did your daughter say to you about Mr. Bishop  
5 using the name Major Taylor?  
6 A I don't know that date either.  
7 Q No. What did she say?  
8 A She said he was using the Major Taylor name  
9 fraudulently.  
10 Q Did she give you any details about why he was using  
11 the name fraudulently?  
12 A No authorization from the family.  
13 Q And do you believe that that is fraudulent use of  
14 the name if he didn't receive authorization from  
15 the family?  
16 A For a commercial purpose, yes.  
17 Q What's your feeling about someone who writes a book  
18 about Major Taylor?  
19 A Writes a book?  
20 Q Right. Do they need permission from the family to  
21 write a book?  
22 A No, they don't.  
23 Q And can they make money off --  
24 A Several books have been written without permission  
25 from the family.

Page 50

1 Q And is it possible that those authors made money  
2 when they wrote those books?  
3 A Certainly.  
4 Q And did you file a lawsuit against them?  
5 A No.  
6 Q Why not?  
7 A At the time the books were written, except the last  
8 one, my mother was alive and the senior surviving  
9 blood relative. My mother did not expect or demand  
10 money for advice, services.  
11 Q Were there, to your knowledge, ever any films or  
12 documentaries made about Major Taylor?  
13 A Yes. There was an HBO documentary, I guess you  
14 would call it, HBO movie. It wasn't really a  
15 documentary.  
16 Q As far as you know, did HBO receive permission from  
17 the family to make the documentary?  
18 A I don't know. It would have been permission from  
19 my mother, and we never discussed it.  
20 Q Do you think they made any money?  
21 A I don't know. None trickled down to the family, if  
22 that's the question.  
23 Q I think you said you've never met Mr. Bishop until  
24 today; is that correct?  
25 A (Deponent nods.)

1 Q Have you ever spoken to him on the phone?  
 2 A I don't know. I never had a conversation with him.  
 3 I'm not a real celebrity, but I get calls selling  
 4 things, solicitations, asking for endorsements, and  
 5 I usually turn them off. I don't remember any call  
 6 from him about anything. I don't remember a call  
 7 from him.  
 8 Q When you receive --  
 9 A I am certain of one thing.  
 10 Q Okay.  
 11 A I did not give him permission to use Major Taylor's  
 12 trademark.  
 13 Q Do you know whether or not he had contacted your  
 14 mother to try to use the name?  
 15 A I don't know. I doubt it because she would have  
 16 been indignant and told me.  
 17 Q But you're not sure?  
 18 A And she would be indignant about this. She felt a  
 19 great deal about her father and her family. It's a  
 20 family legacy that we're concerned with.  
 21 Q Well, you mention it's a family legacy.  
 22 Is there currently a business deal in the  
 23 works to commercialize the name Major Taylor with  
 24 the family?  
 25 A I have no -- I have no business arrangements with

1 anyone about Major Taylor, the Major Taylor estate,  
 2 legacy, et cetera.  
 3 Q You say you have no business arrangement with  
 4 anyone regarding the use of the Major Taylor name.  
 5 Does anybody else in your family, in your  
 6 extended family, have a business arrangement with a  
 7 third party?  
 8 A I don't know the extent of any business  
 9 arrangement.  
 10 Q Are there any?  
 11 A I don't know.  
 12 Q To your knowledge, does Karen Donovan have a  
 13 business arrangement?  
 14 A I don't know what arrangement she has.  
 15 Q Are you aware of any motion pictures that are in  
 16 the works regarding the Major Taylor name?  
 17 A I'm not the person. What do you mean "in the  
 18 works"?  
 19 Q Are you aware of any plans by someone to produce a  
 20 movie or motion picture about Major Taylor?  
 21 A No, I'm not. I know that Karen has received calls  
 22 from various producers or would-be producers and  
 23 none of them came to anything that I know of.  
 24 Q Are you aware of --  
 25 A I don't know who they are with, amounts of money,

1 or anything like that. Seems to me that these are  
 2 proposals that come up quite often.  
 3 Q So there could be business arrangements that you're  
 4 just not aware of; is that right?  
 5 A There could be, but that's unlikely. It's unlikely  
 6 because she would tell me.  
 7 Q And has there ever been or is there now an  
 8 arrangement with Nike regarding use of the Major  
 9 Taylor name?  
 10 A Yes, but I don't know the details of it. I haven't  
 11 participated in any discussions with Nike or anyone  
 12 else.  
 13 Q And who are the participants in the deal with Nike?  
 14 A My daughter Karen.  
 15 Q Are there any others or just your daughter Karen?  
 16 A I don't know of others.  
 17 Q So just to sum this up -- well, not in summary, in  
 18 conclusion, my last question would be: You don't  
 19 have any direct knowledge of activities by  
 20 Mr. Bishop, do you?  
 21 A Direct knowledge of Mr. Bishop?  
 22 Q You haven't observed Mr. Bishop?  
 23 A I haven't what?  
 24 Q You've not observed Mr. Bishop and his use of the  
 25 name Major Taylor, have you?

1 A Say that again.  
 2 Q You have no personal knowledge or personal  
 3 observation of Mr. Bishop using the Major Taylor  
 4 name; is that correct?  
 5 A Only hearsay from various people who have dealt  
 6 with him, including students at Indiana  
 7 University --  
 8 Q Okay.  
 9 A -- and the university itself, all of which were  
 10 negative. But it's still hearsay.  
 11 MR. BISHOP: Can I consult?  
 12 MR. GADSON: We're almost done here.  
 13 (Off the record.)  
 14 MR. GADSON: I have no further questions.  
 15 THE REPORTER: Do you want signature?  
 16 MR. BURSİK: Sure.  
 17 (At which time the deposition was concluded  
 18 at 2:20 p.m.)  
 19  
 20 AND FURTHER THE DEPONENT SAITH NOT.  
 21  
 22  
 23 \_\_\_\_\_  
 24 DALLAS COVERDALE BROWN, JR.  
 25

STATE OF INDIANA)  
 ) SS:  
COUNTY OF JOHNSON)

I, Sherri L. Segó, Notary Public in and for Johnson County, Indiana, do hereby certify that the deponent was by me sworn to tell the truth in the aforementioned matter;

That the deposition was taken on behalf of Mr. Dallas Brown and Ms. Karen Brown-Donovan at the time and place heretofore mentioned with counsel present as noted;

That the deposition was taken down by means of stenographic notes, reduced to typewriting under my direction and is a true record of the testimony given by said deponent and was thereafter presented to the deponent for signature;

I do further certify that I am a disinterested person in this cause of action; that I am not a relative or attorney of any of the

parties or otherwise interested in the events of

this action and am not in the employ of the

attorneys for the respective parties.

David H.E. Bursik  
LAW OFFICE OF DAVID H.E. BURSİK  
401 Hamburg Turnpike  
Suite 210  
Wayne, New Jersey 07470

NOTICE OF DEPOSITION FILING  
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

DALLAS C. BROWN, JR.,  
Petitioner, ) Cancellation No. 92050965  
v. ) Registration No. 2791896  
COURTNEY L. BISHOP, ) Registration No. 2701247  
Registrant. ) Marks: Major Taylor

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

KAREN B. DONOVAN, )  
Plaintiff, )  
v. ) Case No. 1:09-CV-0275-WTL-TAB  
COURTNEY L. BISHOP, )  
Defendant.

In compliance with the Indiana Rules of Procedure, Rules of the Industrial Board of Federal Rules of Procedure, pursuant to Indiana Supreme Court order dated 10-1-86, you are hereby notified of the filing with Counsel for Mr. Dallas Brown and Ms. Karen Brown-Donovan of the deposition of DALLAS COVERDALE BROWN, JR. taken on November 5, 2009.

\_\_\_\_\_  
(Date of Filing)

cc:  
ASSOCIATED REPORTING, INC.  
Two Market Square Center  
251 East Ohio Street, Suite 940  
Indianapolis, Indiana 46204  
(317) 631-0940

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 23rd day of November, 2009.

\_\_\_\_\_  
Sherri L. Segó,  
Notary Public  
Residing in Johnson County

My Commission Expires:  
June 1, 2016

<p style="text-align: center;"><b>A</b></p> <p><b>AA</b> 4:20 24:19  <b>able</b> 37:2,11  <b>about</b> 12:15 13:3 15:20  16:6 17:5,13 20:24  21:10 23:4 26:1  27:10 28:13,18 30:19  39:5 41:23,23 43:25  47:17 48:21,22 49:4  49:10,17,18 50:12  51:6,18,19 52:1,20  <b>above</b> 17:9  <b>above-captioned</b> 1:20  <b>Absolutely</b> 48:2  <b>accomplishments</b>  28:12  <b>accurate</b> 11:21 29:18  31:9,14,23  <b>achievements</b> 19:7  <b>achievers</b> 21:6  <b>act</b> 31:20 32:20 33:21  42:4,12  <b>action</b> 34:17 35:4 36:9  55:18,23  <b>activities</b> 53:19  <b>Actually</b> 23:14  <b>address</b> 31:11  <b>advance</b> 15:21  <b>advice</b> 30:16 50:10  <b>affairs</b> 31:25  <b>affixed</b> 56:10  <b>above-mentioned</b> 55:7  <b>after</b> 31:22 35:20  <b>afternoon</b> 6:8  <b>again</b> 6:17 8:21 13:5  14:19 20:13 21:25  22:3 23:13 24:12  28:10 36:4 37:14,15  37:21 54:1  <b>against</b> 12:8 50:4  <b>agree</b> 31:5 32:5 35:14  42:22  <b>agreed</b> 35:12 42:1,12  <b>agreement</b> 44:9  <b>ahead</b> 15:19 34:23  36:22 39:15,17  <b>alive</b> 26:11 50:8  <b>allow</b> 37:15 46:22,23  <b>allowed</b> 36:17 38:1,6  <b>almost</b> 54:12  <b>Alpha</b> 4:7,7 16:17,19  22:6,6  <b>always</b> 21:4  <b>ambiguous</b> 40:2  <b>amounts</b> 52:25  <b>Andrew</b> 19:18  <b>announcement</b> 4:9  22:15  <b>another</b> 21:14 22:2  34:8,11,12 35:2,23,25  36:9,13,25 42:18</p>	<p><b>answer</b> 13:22 27:1 30:8  32:18,23 33:14 35:3  35:24 36:11,19 37:7  37:13,15,21 38:3  39:14,21,23,25 40:3,5  40:7 41:6 43:11 44:4  45:11,17 46:2,16,22  <b>answered</b> 37:13 39:20  43:9 46:3  <b>answers</b> 6:14 40:3  <b>ant</b> 17:9  <b>anybody</b> 38:18 52:5  <b>anyone</b> 27:22 28:1,5  38:24 40:9 52:1,4  53:11  <b>anything</b> 51:6 52:23  53:1  <b>anyway</b> 28:23  <b>apart</b> 27:19  <b>appeal</b> 1:1 42:24,24  43:1 44:17 57:5  <b>appealing</b> 43:7 44:15  <b>appear</b> 25:18  <b>APPEARANCES</b> 2:1  <b>apple</b> 34:9,11 36:25  <b>application</b> 14:5  <b>applications</b> 13:14  <b>approve</b> 41:15  <b>argument</b> 36:20  <b>Army</b> 9:8  <b>arrangement</b> 52:3,6,9  52:13,14 53:8  <b>arrangements</b> 51:25  53:3  <b>article</b> 4:12,13 17:14  <b>aside</b> 20:8  <b>asked</b> 6:13 15:25 37:16  42:15  <b>asking</b> 13:22,25 14:2  32:18 33:1,19 37:18  42:16 45:18 46:15  51:4  <b>aspects</b> 12:13  <b>ASSOCIATED</b> 1:23  57:23  <b>Association</b> 14:22  15:14 21:16  <b>assume</b> 11:9  <b>attempt</b> 35:23,25 36:1  47:14  <b>attend</b> 7:15,19,19,22  27:8,15  <b>attendance</b> 15:17 20:24  <b>attenders</b> 21:6  <b>attending</b> 14:15  <b>attorney</b> 55:19  <b>attorneys</b> 55:25  <b>August</b> 7:12  <b>authority</b> 31:19 32:8  32:13,20 33:5,10,15  33:21 35:10,16 42:2,3</p>	<p>42:20  <b>authorization</b> 30:17  49:12,14  <b>authorized</b> 31:19  <b>authors</b> 50:1  <b>autobiography</b> 19:15  <b>automatically</b> 12:16  <b>available</b> 16:5  <b>avoid</b> 6:16  <b>avoids</b> 13:3  <b>award</b> 22:9  <b>aware</b> 30:21 48:10,11  52:15,19,24 53:4  <b>away</b> 23:16 41:3,7  <b>A2</b> 22:18</p> <p style="text-align: center;"><b>B</b></p> <p><b>B 1</b>:9 3:5 6:1 7:3 57:12  <b>baby</b> 25:16  <b>back</b> 28:22 43:14 46:12  48:7  <b>basically</b> 32:7  <b>BB</b> 4:21 24:23  <b>bear</b> 48:8  <b>become</b> 48:11  <b>before</b> 1:1,14 6:19 16:2  16:3 26:25 29:20  32:23 37:16 42:14,15  57:5  <b>behalf</b> 1:19 31:20 32:21  33:21 42:4,12 55:8  <b>being</b> 15:20 48:18  <b>belief</b> 38:18 46:2  <b>believe</b> 28:22 30:3  40:25 42:25 43:6  49:13  <b>belligerent</b> 24:9  <b>belong</b> 17:13 41:18  <b>below</b> 11:25  <b>beneficiary</b> 19:24,25  <b>beside</b> 25:1,8,9  <b>best</b> 8:24 9:2,15 13:2  27:21,25 28:4 30:6  <b>better</b> 21:18  <b>Betty</b> 26:15,19 31:12  <b>Betty's</b> 26:15  <b>between</b> 44:24  <b>beyond</b> 17:1  <b>bicycle</b> 8:17 19:15  47:24  <b>bicycling</b> 45:4  <b>big</b> 14:23,25  <b>bikers</b> 15:16  <b>biography</b> 4:4 21:10  <b>birth</b> 3:7,8 9:21,22 10:6  10:8 11:2  <b>birthday</b> 4:5,8,12 21:24  22:4,5,20,21 24:25  25:15 26:21 27:14  <b>Bishop</b> 1:5,10 2:8,15  12:9,10,19 13:6,14</p>	<p>14:5 18:5 19:9 44:24  48:10,11 49:4 50:23  53:20,21,22,24 54:3  54:11 57:8,14  <b>Bishop's</b> 14:10 47:16  <b>bite</b> 34:8,11 36:25  <b>black</b> 16:20  <b>blacks</b> 16:24  <b>blood</b> 9:16 37:2,5,8  43:24 44:8 50:9  <b>Bloomington</b> 7:24  47:16  <b>board</b> 1:1 44:17 57:5  57:16  <b>book</b> 19:18,19,19 49:17  49:19,21  <b>books</b> 19:12 49:24 50:2  50:7  <b>born</b> 7:11,13  <b>Boston</b> 4:13 23:10,14  <b>both</b> 25:18 26:10  <b>Boulevard</b> 16:8,10  <b>Boulé</b> 3:17 16:17,19  17:15,21  <b>breaking</b> 20:11  <b>Brigadier</b> 9:8  <b>bring</b> 34:12  <b>brothers</b> 8:25 9:3  <b>Brown</b> 1:3,13,20 2:2,2  2:14 3:2,7,10,20,21  3:25 4:2,4,6,8,10,12  5:10 6:8 7:1 8:1,3  19:22 28:9 30:1,19  35:12,22 36:5 37:24  40:8 44:1 47:1 48:7  54:23 55:9 57:7,17,18  <b>Brown's</b> 30:25  <b>Brown-Donovan</b> 3:2  4:2 5:10 15:11 55:9  57:18  <b>Bursik</b> 2:3,3,22 6:7  12:24 18:14 28:8  29:6 31:7 32:10,23  33:6,12,16 34:10,16  34:21,23 35:3,7,11,14  35:24 36:11,17,19,22  37:4,13,19,21 38:3  39:4,15,17,21 40:1  42:5,8 43:9,13 44:3,5  45:10,17,19 46:3,10  46:14,17,21,25 47:2,8  47:23 48:2,22,25  54:16 57:1,1  <b>business</b> 51:22,25 52:3  52:6,8,13 53:3  <b>businessman</b> 41:17  <b>businessmen</b> 16:23  <b>B6</b> 23:10</p> <p style="text-align: center;"><b>C</b></p> <p><b>C 1</b>:3 3:7 4:10 6:1 9:20</p>	<p>57:7  <b>cake</b> 25:15  <b>call</b> 45:5 50:14 51:5,6  <b>called</b> 8:16,21 15:23  <b>calling</b> 8:22 32:24  46:16  <b>calls</b> 51:3 52:21  <b>came</b> 29:10,11 52:23  <b>cancel</b> 12:9  <b>cancellation</b> 1:4 30:20  30:22 31:1,2 33:23  34:1,25 35:21,22  36:10 41:22 42:11,18  42:25 43:3,7,8 44:16  57:7  <b>capacity</b> 38:25 40:10  47:11  <b>Card</b> 3:6  <b>Carolina</b> 6:12 23:16  <b>case</b> 1:10 34:12 41:20  41:21 44:13,14,15,22  44:23 45:7,12 46:4  57:13  <b>cases</b> 42:23  <b>cause</b> 55:18  <b>cc</b> 4:22 25:4 57:22  <b>celebrating</b> 22:5  <b>celebrity</b> 51:3  <b>Center</b> 1:23 57:23  <b>certain</b> 9:17 44:23 51:9  <b>certainly</b> 15:19 30:7  50:3  <b>certificate</b> 3:10,11,13  9:22 10:7,8,18,23,25  11:6,16  <b>certify</b> 55:5,17  <b>cetera</b> 52:2  <b>chance</b> 39:12  <b>chapter</b> 17:13  <b>characterization</b> 32:25  33:17  <b>characterizations</b>  13:23 14:3  <b>charitable</b> 27:22  <b>chart</b> 28:18 29:10,15  <b>Chicago</b> 11:17 30:3,6  <b>child</b> 8:17,19 9:1,4  <b>children</b> 11:25 12:2  26:23 27:11  <b>choice</b> 20:1  <b>circulate</b> 18:15  <b>circumstances</b> 36:15  36:23  <b>citation</b> 3:19 18:21  19:5,6  <b>citizens</b> 21:5  <b>city</b> 14:25  <b>civic</b> 28:1  <b>claim</b> 12:8  <b>clear</b> 40:15,19  <b>clearly</b> 23:21</p>
---	--	---	---	--

<p><b>Cleveland</b> 26:2,3,17  <b>closed-book</b> 27:4  <b>closest</b> 9:16,17 43:23  <b>club</b> 45:4,5 47:24  <b>coaching</b> 47:5  <b>cognizant</b> 46:20  <b>college</b> 7:19,20,22  16:22,25 17:1,2,6  <b>come</b> 13:11 53:2  <b>commerce</b> 12:22 13:9  13:16 14:7  <b>commercial</b> 14:11 39:6  40:13,20,22 47:15  49:16  <b>commercialize</b> 51:23  <b>commercially</b> 37:4  38:2  <b>Commission</b> 56:24  <b>Commonwealth</b> 19:5  <b>complaint</b> 42:6  <b>complete</b> 31:19 32:8,13  32:20 33:21 35:10  42:2,3,19  <b>compliance</b> 57:15  <b>complicated</b> 44:8  <b>computer</b> 16:2,4  <b>concepts</b> 44:1  <b>concerned</b> 30:18 51:20  <b>concerning</b> 19:13 22:3  32:1  <b>concluded</b> 54:17  <b>conclusion</b> 53:18  <b>condominium</b> 26:4,8  <b>Congratulations</b> 9:14  12:6  <b>conjunction</b> 21:16  <b>connection</b> 14:12 30:12  30:15,18 44:20,23,25  45:6,16,22 46:7 47:12  <b>connotation</b> 33:6  <b>consult</b> 54:11  <b>cont</b> 4:1 5:8  <b>contacted</b> 51:13  <b>contention</b> 12:19 13:6  13:13,18,20,24 14:4,9  14:14 37:1,10,24 38:4  38:5,18 40:9  <b>continued</b> 48:5  <b>contract</b> 44:9  <b>contribute</b> 41:19  <b>control</b> 12:18 34:5  <b>controlled</b> 12:13  <b>controversy</b> 12:15  <b>conversation</b> 51:2  <b>convinced</b> 13:10  <b>Cook</b> 11:17 30:3  <b>copies</b> 18:15  <b>copy</b> 7:6 9:21 10:2,6,8  10:17,22,25 11:4,5,14  11:15 15:5 17:25  18:4,5,20 19:21 20:20</p>	<p>21:22 22:14  <b>copyrights</b> 32:3  <b>correct</b> 11:17,18 27:20  29:13 30:5 31:15  32:9 35:11 43:4  50:24 54:4  <b>correcting</b> 43:16,17  <b>COSSELL</b> 2:9  <b>cough</b> 10:3  <b>counsel</b> 55:11 57:17  <b>country</b> 14:24 15:1  21:20 23:15 27:12  28:11  <b>County</b> 1:15 11:17 30:3  55:2,5 56:21  <b>couple</b> 6:10  <b>Courier</b> 4:11 22:19  <b>course</b> 20:4  <b>court</b> 1:7 6:16 9:19  42:23 43:19 57:10,17  <b>Courtney</b> 1:5,10 2:8,15  12:9 19:9 57:8,14  <b>cover</b> 17:25 21:20  <b>Coverdale</b> 3:7 7:1  54:23 57:18  <b>covered</b> 14:25  <b>cried</b> 16:10  <b>crowd</b> 14:23  <b>current</b> 36:8  <b>currently</b> 51:22  <b>cut</b> 17:9 32:17  <b>cyclists</b> 14:23</p> <p style="text-align:center"><b>D</b></p> <p><b>D</b> 3:8 6:1,1 10:6  <b>Daisy</b> 3:12 11:6,8,10  24:2,6,12  <b>Dallas</b> 1:3,13 2:2 3:2,7  4:2,10 5:10 7:1 25:9  54:23 55:9 57:7,17,18  <b>date</b> 10:19,20,23,24  11:2 14:19,21 16:1  48:13 49:1,6 57:20  <b>dated</b> 57:17  <b>dates</b> 16:1  <b>daughter</b> 25:16 29:11  29:12 48:21 49:2,4  53:14,15  <b>David</b> 2:3,3 4:4 21:11  57:1,1  <b>day</b> 1:16 56:10  <b>DD</b> 4:23 25:12  <b>de</b> 15:10  <b>deal</b> 51:19,22 53:13  <b>dealt</b> 54:5  <b>death</b> 3:10,11,13 10:18  10:22,25 11:5,16  21:11  <b>deceased</b> 31:21 32:4  <b>decided</b> 15:21,22 17:14  43:19</p>	<p><b>decision</b> 44:16  <b>dedicated</b> 14:18 15:21  <b>dedication</b> 3:16,23 4:14  21:17 23:13  <b>Defendant</b> 1:11 57:14  <b>define</b> 40:20  <b>demand</b> 50:9  <b>dentists</b> 16:22  <b>depend</b> 36:15,23  <b>depended</b> 45:7  <b>Depending</b> 45:7  <b>depends</b> 45:12,24  <b>depicted</b> 15:8  <b>deponent</b> 10:12 15:24  16:12 20:16 24:6  26:25 27:6 29:5  46:19 47:1 50:25  54:20 55:6,15,16  <b>deposed</b> 6:19  <b>deposition</b> 1:12,19 3:4  10:2 54:17 55:8,12  57:4,18  <b>descendants</b> 3:14 27:8  27:15 29:19  <b>Description</b> 3:3 4:3  5:12  <b>details</b> 49:10 53:10  <b>Diagram</b> 3:15  <b>Diamond</b> 22:6  <b>die</b> 21:1,2 30:2,4,9  <b>died</b> 29:22 30:6,13  <b>dies</b> 22:10  <b>difference</b> 47:24  <b>different</b> 43:2,10  <b>differentiating</b> 39:5,9  <b>differentiation</b> 39:8,11  <b>difficult</b> 16:21  <b>digress</b> 15:18  <b>direct</b> 36:18 53:19,21  <b>direction</b> 55:14  <b>discussed</b> 50:19  <b>discussing</b> 25:1  <b>discussion</b> 42:10 43:25  <b>discussions</b> 53:11  <b>disinterested</b> 55:18  <b>disseminated</b> 21:20  <b>distance</b> 6:17  <b>distinct</b> 21:12  <b>distributed</b> 15:6  <b>DISTRICT</b> 1:7,7 57:10  57:11  <b>DIVISION</b> 1:8 57:11  <b>doctors</b> 16:21  <b>document</b> 3:21,22 7:2  9:19 10:5,16 11:4,14  11:19,20,23 15:4,9  16:15,18 18:19 19:20  20:19,20 21:9,14,15  21:21 22:1,13,17 23:9  <b>documentaries</b> 50:12  <b>documentary</b> 50:13,15</p>	<p>50:17  <b>doing</b> 12:7  <b>donated</b> 30:15  <b>done</b> 18:25 19:3 29:20  34:13 54:12  <b>Donovan</b> 1:9,20 2:2,14  29:13 32:7,13 33:20  34:24 35:20 36:6  41:22 42:10 44:13  52:12 57:12  <b>Donovan's</b> 31:2  <b>doubt</b> 51:15  <b>down</b> 12:4 50:21 55:12  <b>dressed</b> 8:18  <b>Drive</b> 1:17  <b>driver's</b> 3:5 7:6  <b>duly</b> 6:2  <b>DVD</b> 3:18 17:25</p> <p style="text-align:center"><b>E</b></p> <p><b>E</b> 3:10 6:1,1 10:17  <b>earlier</b> 28:19  <b>East</b> 1:24 2:10 57:24  <b>Edwin</b> 15:3,14 23:13  <b>EE</b> 4:24 25:17,19  <b>either</b> 30:11 49:6  <b>employ</b> 55:23  <b>employees</b> 20:12  <b>encourage</b> 28:7,7 36:9  <b>endorsements</b> 32:2  51:4  <b>engaged</b> 24:18  <b>English</b> 33:10  <b>enjoyed</b> 25:2,3  <b>enough</b> 23:20 48:20  <b>enterprise</b> 47:15  <b>entitled</b> 34:4  <b>error</b> 43:16,17  <b>essence</b> 42:24  <b>established</b> 45:14  <b>estate</b> 31:20 52:1  <b>et</b> 52:2  <b>eulogy</b> 3:21 20:20,22  <b>evasive</b> 48:18  <b>even</b> 17:22 28:12 48:14  <b>event</b> 14:15,25 15:6  16:16 17:12 25:5,6  27:16  <b>events</b> 55:21  <b>ever</b> 6:19 13:1 19:8  27:22 28:1,5 50:11  51:1 53:7  <b>every</b> 20:12  <b>everybody</b> 25:17  <b>everyone</b> 18:15,18  <b>everything</b> 20:3 32:8  <b>evidence</b> 6:16  <b>exam</b> 27:4  <b>examination</b> 1:12 2:18  2:21,24 6:6 28:16  36:18 48:5</p>	<p><b>examined</b> 6:4  <b>except</b> 50:7  <b>exception</b> 20:1  <b>exceptional</b> 12:7  <b>excerpt</b> 21:22 22:2  <b>executor</b> 20:1  <b>exert</b> 17:17  <b>exhibit</b> 3:1,4,5,7,8,10  3:11,13,14,16,17,18  3:19,21,22,25 4:1,4,5  4:7,9,11,13,15,16,17  4:18,19,20,21,22,23  4:24,25 5:8,14,16,18  5:20 7:3 9:20 10:1,6  10:17 11:5,15,20 15:4  16:15 18:1,17,19  19:20 20:19 21:9,14  21:21 22:1,13,17 23:9  23:17,23 24:4,10,14  24:19,23 25:4,12,19  25:24 26:14,18 28:22  28:25  <b>exhibitions</b> 8:17  <b>expect</b> 50:9  <b>experience</b> 9:5,6,9  <b>expert</b> 36:14  <b>Expires</b> 56:24  <b>explain</b> 42:19  <b>extended</b> 52:6  <b>extent</b> 32:24,25 52:8  <b>ex-wife</b> 20:2,4</p> <p style="text-align:center"><b>F</b></p> <p><b>F</b> 3:11 11:5  <b>fact</b> 21:7  <b>failed</b> 12:20 13:7  <b>fair</b> 34:13 48:20  <b>false</b> 13:16 44:25 45:6  45:15,21,22 47:12  <b>falsely</b> 14:12 44:20  <b>familiar</b> 42:23  <b>family</b> 11:22,22 12:13  12:21 13:8,11 19:1  25:10,21 27:15,18,22  28:1,5,18,20 32:21  33:21 34:4,7,19,24  35:5,6,7,15 36:9  37:11,25 38:8,20 39:1  40:11 41:1 42:4,13  46:9 47:12 49:12,15  49:20,25 50:17,21  51:19,20,21,24 52:5,6  <b>family's</b> 41:5  <b>fancy</b> 8:18  <b>far</b> 23:16 29:21 30:1,7  30:17 31:8,14 33:12  50:16  <b>Fastest</b> 19:15  <b>father</b> 22:15 24:16  51:19  <b>federal</b> 44:12,15 57:16</p>
--	---	---	--	---

<p><b>Feel</b> 7:16  <b>feeling</b> 49:17  <b>felt</b> 12:12 34:4,7 42:21  43:16 51:18  <b>few</b> 16:23 21:3,6 28:11  28:14 48:8  <b>FF</b> 4:25 25:24  <b>field</b> 15:15  <b>file</b> 12:8 35:1,22 36:5  36:10,13 50:4  <b>filed</b> 33:25 34:3 35:4  42:18,20 43:3,6 44:13  <b>filing</b> 35:16 41:22,24  42:11 57:4,17,20  <b>films</b> 50:11  <b>find</b> 10:9,24 18:23  <b>fine</b> 11:8 33:3,16,18  39:14  <b>finish</b> 34:22  <b>first</b> 6:2 12:1 20:1  23:25 25:15 33:22  34:14,16,17,18,25  35:20,25 36:1 43:1,7  <b>five</b> 11:25  <b>flu</b> 10:3  <b>Following</b> 20:15,18  <b>follows</b> 6:4  <b>forgot</b> 8:6  <b>form</b> 6:14 34:10 39:4  39:15,22 42:5  <b>fortunate</b> 10:9 26:10  <b>found</b> 10:9,12 11:2  <b>foundation</b> 40:22,24,25  41:3,7,13,16,16,20  <b>four</b> 24:1  <b>France</b> 15:10  <b>fraternal</b> 16:19  <b>fraternities</b> 16:25 17:5  <b>fraternity</b> 17:2  <b>fraudulent</b> 49:13  <b>fraudulently</b> 49:9,11  <b>free</b> 7:16  <b>frequently</b> 21:3  <b>friends</b> 25:21,22 26:9  26:11  <b>from</b> 6:12 11:25 12:4  12:20 13:7,10,11  14:23 17:17 21:22,23  22:2,18 26:1 27:19  29:10,11,12,15,25  30:25 31:1 40:11  41:1 46:9 47:5,11  49:12,14,20,25 50:16  50:18 51:6,7 52:22  54:5  <b>front</b> 15:9  <b>full</b> 6:25 16:4,11 21:2  <b>funeral</b> 27:7,8  <b>funerals</b> 21:4  <b>further</b> 28:8 54:14,20  55:17</p>	<p style="text-align: center;"><b>G</b></p> <p><b>G</b> 3:13 11:15  <b>Gadson</b> 2:9,25 6:8  12:23 13:1 27:4 28:9  28:10,17 32:12 33:4,9  33:14,18 34:22 35:6,9  35:12,18 36:3,16,21  37:6,18,22 39:10,16  39:18,24 42:7 43:11  43:15 44:4,7 45:18  46:15,25 47:5,18,21  48:1,6,24 54:12,14  <b>Garden</b> 15:25  <b>gave</b> 19:25 20:12 30:16  41:3,7 44:4 47:2  <b>Gazette</b> 21:23 22:3  <b>General</b> 6:8 7:9,9 9:8  12:19 13:1,6 14:9  27:5 28:9 30:1,19  35:12,21 36:5 37:24  40:7 42:16 44:1 47:1  48:7  <b>generation</b> 9:18  <b>GG</b> 5:14 26:6  <b>gifts</b> 20:12  <b>give</b> 22:9 33:1 49:10  51:11  <b>given</b> 6:19 18:21 29:16  38:16 55:15  <b>glad</b> 25:3  <b>Globe</b> 4:13 23:10,14  <b>go</b> 8:2,13 15:19,22,23  21:4 22:12 28:22  34:23 36:22 39:15,17  48:1  <b>goes</b> 31:25 43:18  <b>going</b> 13:2,4 17:25 18:1  18:4,12,14,18 36:13  43:15 44:12  <b>good</b> 6:8 21:12,25 26:9  26:11,13 29:18 39:5  41:20  <b>gotten</b> 45:21  <b>grandchildren</b> 12:3  <b>grandfather</b> 8:4,12  14:13 16:11 19:13  30:11  <b>grandfather's</b> 30:17  <b>grandmother</b> 11:11  24:2,21  <b>great</b> 51:19  <b>great-grandchildren</b>  12:1  <b>great-granddaughter</b>  15:11 31:16  <b>Greetings</b> 4:6,8  <b>Greg</b> 6:8,12 15:10  26:22 27:1  <b>Gregory</b> 2:9 28:9  <b>group</b> 12:2 17:1,8,11  32:15 47:15,16</p>	<p><b>groups</b> 16:24 47:17  <b>guess</b> 11:2 15:12 17:24  22:10 24:17 25:9  30:17 50:13  <b>guessing</b> 24:1  <b>guests</b> 15:2</p> <p style="text-align: center;"><b>H</b></p> <p><b>H</b> 3:14 11:20 28:22,25  <b>Hamburg</b> 2:4 57:2  <b>HAMPTON</b> 1:17  <b>hand</b> 56:10  <b>handle</b> 31:25 32:8,13  <b>happen</b> 12:16 41:8  <b>happier</b> 24:13  <b>happy</b> 24:8 26:12  <b>Hard</b> 27:12  <b>Hatfield</b> 1:17  <b>having</b> 6:2  <b>Hawaii</b> 31:4,13  <b>HBO</b> 50:13,14,16  <b>head</b> 27:18  <b>headquarters</b> 14:21  <b>hear</b> 20:10,14  <b>hearing</b> 28:23  <b>hearsay</b> 54:5,10  <b>held</b> 16:3  <b>her</b> 10:22,25 19:7,23,24  19:25 20:12,20 21:11  21:13,25 22:5,5 23:7  23:7,21 25:9,14,22  26:19 29:7 35:16  41:22,23 42:1,11,11  43:13 44:15 51:19,19  <b>heretofore</b> 55:10  <b>hereunto</b> 56:8  <b>Herndon</b> 4:4 21:11  <b>HH</b> 5:16 26:14  <b>Hi</b> 28:9  <b>high</b> 21:6  <b>highest</b> 22:8,9  <b>Hilton</b> 15:25  <b>him</b> 8:16,18,21,22  17:24 23:20,20,21  29:8 32:24 33:14  37:15 39:13,24 43:15  45:17 47:2,7,8 48:25  51:1,2,6,7,11 54:6  <b>holding</b> 23:25  <b>home</b> 20:9  <b>Honolulu</b> 31:13  <b>honor</b> 17:9 22:9  <b>honoring</b> 16:11  <b>hope</b> 41:13,14  <b>hospital</b> 20:9 30:3  <b>hotel</b> 16:9  <b>house</b> 3:19 18:20 19:6  26:16  <b>Huh</b> 41:10 48:16 49:3  <b>hundred</b> 14:24 22:11  <b>hungry</b> 24:9</p>	<p><b>hurt</b> 20:23  <b>hypothetical</b> 36:12,12  41:6  <b>H.E</b> 2:3,3 57:1,1</p> <p style="text-align: center;"><b>I</b></p> <p><b>ID</b> 7:6,7,8  <b>idea</b> 8:15  <b>identification</b> 3:6 7:3  <b>identified</b> 9:20  <b>identify</b> 23:18,19,21  25:24 26:13,18,20  <b>ignore</b> 13:5  <b>II</b> 5:18 26:18,18  <b>images</b> 32:2  <b>implies</b> 35:25  <b>impressive</b> 19:3  <b>INC</b> 1:23 57:23  <b>including</b> 19:15 54:6  <b>incorporated</b> 18:16  <b>INDEX</b> 2:18 3:1 4:1  5:8  <b>Indiana</b> 1:7,15,18,18  1:24 2:10 7:24 12:22  13:9 30:4,5,13 54:6  55:1,5 57:11,15,16,24  <b>Indianapolis</b> 1:8,17,24  2:10 6:11 57:11,24  <b>indicate</b> 47:7  <b>indicating</b> 23:3,5,8  <b>indignant</b> 51:16,18  <b>individual</b> 31:3,21 32:4  <b>Industrial</b> 57:16  <b>infant</b> 24:1  <b>informed</b> 15:20  <b>initial</b> 8:7,8  <b>Inn</b> 1:17 15:25  <b>input</b> 29:15  <b>instructing</b> 39:13,24  <b>instruction</b> 47:2  <b>intending</b> 39:7  <b>intent</b> 33:19  <b>intention</b> 32:15 37:20  <b>interest</b> 28:2  <b>interested</b> 36:24 41:13  55:21  <b>interview</b> 18:9,10  <b>interviewed</b> 18:13  <b>invited</b> 15:22  <b>issue</b> 13:3 21:23 22:19  22:20</p> <p style="text-align: center;"><b>J</b></p> <p><b>J</b> 3:17 6:1 16:15  <b>JAG</b> 6:22  <b>Jersey</b> 2:5 57:3  <b>JJ</b> 5:20 26:20  <b>Johnson</b> 1:15 55:2,5  56:21  <b>join</b> 17:6  <b>journal</b> 3:17 17:15,16</p>	<p><b>Joyce</b> 23:25  <b>Jr</b> 1:3,13 3:7 7:1 54:23  57:7,18  <b>judge</b> 40:1 41:20  <b>judicial</b> 6:20,22  <b>July</b> 18:8  <b>June</b> 11:17 56:25  <b>just</b> 7:3 10:1,22,24  13:25 18:17 22:24  23:21 27:1,1 29:16,24  32:18 34:8 36:16  41:16 43:9 48:18,22  53:4,15,17  <b>justice</b> 34:13 36:24  37:1 42:22</p> <p style="text-align: center;"><b>K</b></p> <p><b>K</b> 3:18 18:1  <b>Kappa</b> 4:7 22:6  <b>Karen</b> 1:9 2:2,14 3:2  4:2 5:10 10:13 15:2  15:11 27:2 29:12  30:25 31:2 32:7,13  33:20 34:24 35:6,20  36:6 41:22 42:10  43:19 52:12,21 53:14  53:15 55:9 57:12,18  <b>Karen's</b> 43:18 44:14  <b>kept</b> 8:22  <b>kind</b> 8:20  <b>knew</b> 10:10  <b>know</b> 7:4,15 10:22  12:14 13:17,17 17:5  17:21 18:24 20:4  22:7 25:17,23 29:7,9  29:17,21,23 30:1,7,8  30:14,18 31:8,14 33:2  40:3 41:8 48:18,19  49:6 50:16,18,21 51:2  51:13,15 52:8,11,14  52:21,23,25 53:10,16  <b>knowledge</b> 8:24 9:2,15  27:21,25 28:4 29:4  30:6 50:11 52:12  53:19,21 54:2  <b>KUEHN</b> 2:9</p> <p style="text-align: center;"><b>L</b></p> <p><b>L</b> 1:5,10,14 3:19 6:1,1,1  18:19 55:4 56:19  57:8,14  <b>Lamda</b> 16:17,19  <b>last</b> 8:10 13:5 39:6 50:7  53:18  <b>later</b> 6:15,15 27:2  36:20  <b>latitude</b> 36:17  <b>law</b> 2:3 12:22,25 57:1  <b>lawsuit</b> 50:4  <b>lawyers</b> 16:21  <b>lay</b> 33:1,11,12</p>
--	--	---	--	---

<p>layman's 44:5  <b>layperson</b> 13:25 14:2 33:2  <b>leading</b> 15:16  <b>learned</b> 16:12 20:25  <b>leave</b> 29:21  <b>LEE</b> 2:9  <b>left</b> 6:9 20:3,6 21:7  <b>legacy</b> 12:12 32:1 34:5 51:20,21 52:2  <b>legal</b> 6:10 13:21,22 14:3 32:24 33:6,11,16 44:3,4  <b>LeMond</b> 15:10  <b>let</b> 12:25 30:19 34:22 45:17  <b>Let's</b> 28:22 36:3  <b>license</b> 3:5 7:6  <b>life</b> 17:8 21:7,13,25 22:8  <b>like</b> 15:2 16:24 17:24 31:1 37:22 47:15,18 47:21 53:1  <b>likenesses</b> 32:2  <b>line</b> 12:4  <b>little</b> 8:22 20:23 24:12  <b>live</b> 22:10 27:11  <b>living</b> 9:16,17 43:24  <b>LLP</b> 2:9  <b>located</b> 16:7,9  <b>long</b> 10:11  <b>look</b> 10:24 11:20 24:8,8 36:23  <b>looked</b> 16:6  <b>looking</b> 10:19 25:14  <b>lose</b> 34:15,16  <b>lost</b> 34:14,18  <b>lot</b> 12:5 44:7 48:7  <b>louder</b> 28:24  <b>Louisiana</b> 7:14  <b>LOVE</b> 2:9  <b>Lynne</b> 15:12,12</p> <hr/> <p style="text-align: center;"><b>M</b></p> <p><b>M</b> 3:21 20:19  <b>made</b> 10:1 14:4 19:25 29:16,17 31:7,8 50:1 50:12,20  <b>main</b> 25:2  <b>Major</b> 1:5 3:15,23 8:14 8:15,16,22,22 9:16 11:12,16,24 12:4,10 12:12,20,21 13:7,8,15 14:6,10,13,17,18,22 15:11,13 16:8,9 17:14 17:20 19:13,19 21:16 23:19 24:21 27:8,15 27:21,23,25 28:4,6,13 29:18,21,25 30:1,11 30:22 31:17,21,22 32:4,14 33:22 34:5</p>	<p>37:3,11,12,25 38:1,6 38:7,19,25 40:10,12 40:16,24 44:19,20,24 45:5,6,13,20,22 46:7 47:10,13 48:12 49:5,8 49:18 50:12 51:11,23 52:1,1,4,16,20 53:8 53:25 54:3 57:9  <b>make</b> 14:2 17:7 18:4,5 18:17 32:24 39:7 43:25 45:14 47:14,25 49:23 50:17  <b>making</b> 27:22 28:1,5 39:10 40:21  <b>manager</b> 15:13  <b>manner</b> 32:3 38:7,9,21  <b>many</b> 16:24 21:1 22:7  <b>marked</b> 7:2 10:3,5,16 11:14,19 15:4 16:15 18:1,19 19:20 20:19 21:9,14,21 22:1,13,17 23:9,17,23 28:25  <b>Market</b> 1:23 57:23  <b>marketed</b> 11:4  <b>Marks</b> 1:5 57:9  <b>marriage</b> 22:14  <b>married</b> 11:12 24:17 26:12  <b>Marshall</b> 3:13,14 8:6,9 8:11,12 28:13 30:11 31:16,21  <b>Massachusetts</b> 10:10 21:17  <b>material</b> 20:5  <b>materials</b> 47:20  <b>matter</b> 1:21 13:21 17:1 38:11,13,15,21 41:9 41:11 55:7  <b>matters</b> 6:10 32:9,14 32:22  <b>may</b> 6:16 9:13 10:21 11:3 14:15,20 21:23 22:3,18 23:10  <b>maybe</b> 17:6,7,7 24:9  <b>mean</b> 16:8 20:11,11 24:17 35:15 36:25 37:4 38:13 52:17  <b>meaning</b> 33:11  <b>meanings</b> 33:11,13  <b>means</b> 35:16 55:13  <b>medalist</b> 15:15  <b>meet</b> 19:9 26:2  <b>member</b> 36:10  <b>members</b> 32:21 33:22 34:19,24 35:5,6,8,15 39:1 41:1  <b>memorabilia</b> 32:1  <b>memorial</b> 20:21,22  <b>memory</b> 22:8  <b>men</b> 16:20  <b>mention</b> 51:21</p>	<p><b>mentioned</b> 55:10  <b>met</b> 50:23  <b>Michigan</b> 2:10  <b>middle</b> 8:6,7,8  <b>military</b> 6:23,24 7:7 8:23 9:5,6,9 16:23  <b>minute</b> 36:16  <b>mischaracterization</b> 32:11  <b>mischaracterized</b> 35:4  <b>mistreated</b> 34:7  <b>money</b> 40:21 41:4,7 45:14 47:14 49:23 50:1,10,20 52:25  <b>monthly</b> 17:15  <b>months</b> 15:21 24:1  <b>monument</b> 21:19 23:14  <b>more</b> 17:3 44:8 47:22 48:7,8  <b>Moses</b> 15:3,14 23:13  <b>most</b> 25:10 27:9 42:22  <b>motel</b> 16:7  <b>mother</b> 7:25 9:2 10:7 10:18 11:11,24 12:14 13:12 18:13,22 19:21 20:8,18 21:10,24 22:4 22:15,21,22,25 23:19 23:25 24:16,21 25:1,8 25:14,18 26:1,2,5,8,8 26:15,16,19,19,24 27:7,19 30:8,12,14 50:8,9,19 51:14  <b>mother's</b> 8:5,13 10:8 11:11 25:20  <b>mother-in-law</b> 26:9  <b>mother-in-law's</b> 26:4,7  <b>motion</b> 52:15,20  <b>movie</b> 50:14 52:20  <b>much</b> 10:15 23:22  <b>must</b> 24:6</p> <hr/> <p style="text-align: center;"><b>N</b></p> <p><b>N</b> 3:22 6:1 21:14  <b>name</b> 6:25 7:25 8:4,6 8:10,13,15 14:6 15:24 38:7,19 40:16 45:9,13 45:20 46:1,4,8,8 47:10 48:12 49:5,8,11 49:14 51:14,23 52:4 52:16 53:9,25 54:4  <b>named</b> 16:7 19:24  <b>names</b> 8:2  <b>national</b> 14:21 16:19  <b>NBC</b> 18:8  <b>need</b> 6:16 7:16 10:20 10:22,23 25:17 40:25 41:4 47:5 49:20  <b>negative</b> 54:10  <b>never</b> 20:13 29:25 50:19,23 51:2  <b>new</b> 2:5 4:11 7:14 17:2</p>	<p>22:19 35:22 45:18,19 57:3  <b>newspaper</b> 22:18 23:10  <b>newspapers</b> 15:1 23:15  <b>nice</b> 15:7 20:22,22  <b>nickname</b> 8:21  <b>Nike</b> 53:8,11,13  <b>nobody</b> 37:1,10,24 38:5  <b>nods</b> 50:25  <b>noncommercial</b> 38:7,9 38:14,21 39:6 40:18  <b>none</b> 50:21 52:23  <b>nonprofit</b> 28:5  <b>notarial</b> 56:10  <b>Notary</b> 1:14 55:4 56:20  <b>noted</b> 55:11  <b>notes</b> 55:13  <b>nothing</b> 6:3 8:23 19:1  <b>notice</b> 3:4 10:2 57:4  <b>noticed</b> 20:16  <b>notified</b> 57:17  <b>November</b> 1:16 56:12 57:18  <b>number</b> 27:7,14  <b>nursing</b> 20:9</p> <hr/> <p style="text-align: center;"><b>O</b></p> <p><b>O</b> 3:25 6:1,1 19:20  <b>object</b> 32:10,25 34:18 34:21 35:24 36:18 39:4,13,19,19 40:5 42:5 46:5,6  <b>objected</b> 27:22 28:1,5  <b>objection</b> 12:23 13:1 34:10 36:20 39:22 44:3  <b>objections</b> 6:14 13:3  <b>observation</b> 54:3  <b>observed</b> 53:22,24  <b>obviously</b> 25:3 30:14 43:21  <b>occasion</b> 20:12  <b>off</b> 28:23 32:17 48:1,3 49:23 51:5 54:13  <b>OFFICE</b> 1:1 2:3 57:1,5  <b>officers</b> 16:23  <b>often</b> 53:2  <b>Oh</b> 21:12  <b>Ohio</b> 1:24 57:24  <b>okay</b> 7:9 11:8 13:24 17:19 27:3 33:4 34:23 36:3,22 39:21 42:8 48:9 51:10 54:8  <b>older</b> 20:25 21:3  <b>Olympic</b> 15:15  <b>Olympics</b> 18:8  <b>Once</b> 8:19  <b>one</b> 9:18 10:10 14:2,5 17:2,3 18:4,6,7,18 21:12,18 22:11 23:3,4 23:7 25:11 27:13</p>	<p>35:1 41:13,14 43:1,23 50:8 51:9  <b>ones</b> 21:19  <b>only</b> 8:19 9:1,4,18 20:24 21:3,6 39:15 43:23 54:5  <b>opinion</b> 32:12 39:3  <b>opportunity</b> 19:8,12 34:12 35:2 39:16  <b>oral</b> 1:12  <b>order</b> 13:8 57:17  <b>organization</b> 16:20  <b>organizations</b> 41:18,18  <b>Orleans</b> 7:14  <b>other</b> 8:2,13 16:24 18:25 25:21 36:12 44:10  <b>others</b> 15:3,15 17:4 41:19 53:15,16  <b>otherwise</b> 55:21  <b>out</b> 6:11 14:24 16:6 17:11 37:22 39:12 44:12  <b>outgrew</b> 8:20  <b>outside</b> 37:2,10,25  <b>outstanding</b> 21:5  <b>over</b> 14:23 15:1 21:20 23:15 27:12  <b>own</b> 19:19 28:12  <b>owned</b> 13:15</p> <hr/> <p style="text-align: center;"><b>P</b></p> <p><b>P</b> 2:9 4:4 21:9  <b>page</b> 2:19 3:3 4:3 5:12 15:9 22:18,23,24 23:10,12  <b>paid</b> 20:4  <b>paper</b> 22:20,23  <b>Paragraph</b> 44:18  <b>paraphrasing</b> 43:2  <b>pardon</b> 10:3  <b>participants</b> 53:13  <b>participated</b> 53:11  <b>participating</b> 18:9  <b>particular</b> 17:8  <b>parties</b> 55:21,25  <b>party</b> 22:21 24:25 26:21 27:14 34:17 36:1 52:7  <b>passed</b> 26:10  <b>passing</b> 20:18  <b>PATENT</b> 1:1 57:5  <b>peace</b> 9:9  <b>pending</b> 6:10  <b>Pennsylvania</b> 18:20 19:6 30:10  <b>people</b> 8:16 14:24 17:4 20:24,25 21:1,2,5 38:16 54:5  <b>perceive</b> 14:1  <b>permission</b> 12:20 13:7</p>
---	---	---	---	--

13:10,11 37:5,8,9 38:8,16,20 39:1 40:11 40:18 41:1,5,12 45:21 46:9 47:11 49:20,24 50:16,18 51:11 person 52:17 55:18 persona 32:1 personal 54:2,2 person's 36:13 petition 31:2 35:9 41:24 42:18 43:3,6,7 Petitioner 1:4 31:3,16 57:7 phone 51:1 phonetic 31:12 Photo 26:18 photograph 4:15,16,17 4:18,19,20,21,22,23 4:24,25 5:14,16,18,20 15:8 23:17,18,23,24 24:4,5,10,11,14,19,23 25:4,7,19,25 26:6,13 26:20 phrased 13:4 picture 16:8 21:19 22:25 23:11,11 26:3,4 52:20 pictures 23:20 52:15 Pittsburgh 4:11 21:23 22:2,19 25:22 26:2 30:10 place 16:4,10 21:2 31:12 55:10 places 27:12 plaintiff 1:9 35:7 57:13 plans 52:19 play 18:3 34:13 please 24:15 point 27:18 38:4 possible 44:10 50:1 Post 21:23 22:3 Post-Gazette 4:5 prepare 28:20 29:1,5 prepared 21:11,15 29:4 43:25 present 2:13 55:11 presented 55:16 presidents 16:22 printed 17:20,22 prior 19:8 41:22 42:10 48:15,17 probably 6:22 43:20 problem 33:8,13 Procedure 1:19 57:16 57:16 procedure-wise 27:1 proceeding 6:22,23 30:20,22 33:23 34:1,3 34:25 35:21,22 36:2,6 36:10,13 41:23 42:11 42:25	proceedings 6:20,22,24 produce 52:19 produced 1:13 producers 52:22,22 professional 16:20 professors 16:22 profit 46:4 program 3:16,22 15:6 15:7 17:11 21:15 property 20:2,2 proposals 53:2 proved 43:22 provide 20:1 pseudonym 8:14 public 1:14 28:2 55:4 56:20 purpose 49:16 purposes 14:11 pursuant 1:18 57:16 put 7:4 17:11,15,23 p.m 1:16 54:18	55:14 records 32:2 redirect 39:12 reduced 55:13 refer 7:5,9 reference 28:6 references 7:4 27:23 referred 16:17 31:22 referring 12:24 regard 32:21 regarding 52:4,16 53:8 Regardless 42:15 registered 45:1 Registrant 1:5 57:9 Registrant's 44:19 registration 1:4,5 12:10 14:10 44:19 57:8,8 related 20:20 32:9 45:2 45:15 relates 18:8 21:24 22:20 relating 6:10 12:10 14:16 16:16 32:4 relative 9:16,17 17:23 37:2,5,8 43:24,24 50:9 55:19 relatives 44:8 remarkable 11:23 remember 15:7 21:18 48:13,13,19,23 49:1 51:5,6 repeatedly 38:17 rephrase 12:25 13:2 35:18 36:3,21 reporter 9:19 54:15 REPORTING 1:23 57:23 represent 10:6 representative 18:24 Representatives 3:19 18:21 19:6 represents 9:21 10:17 11:21 required 12:22 reservations 16:1,4 reserve 36:20 resident 31:4 residential 31:11 Residing 56:21 resolved 6:15 respect 30:22 respective 55:25 respond 37:16 47:3 responding 40:4 responsibility 31:20 restate 46:10 retire 9:10 retired 9:8 Rider 19:16 riding 8:17	right 14:6 22:24 23:3 28:12 30:23 31:9 33:12,25 34:1 35:18 38:5 39:19 43:5 44:7 49:20 53:4 rights 42:23 Rita 3:8 4:10 8:1,2 Ritchie 19:18 Ritchie's 19:19 robbed 20:8 role 40:13 rule 40:2 ruled 32:16 Rules 1:18 57:15,16,16 ruling 42:22	S S 4:9 6:1 22:13 SAITH 54:20 same 16:16 21:4 25:5,6 26:7,19 37:14,15,18 45:9 saw 20:13 29:25 saying 32:7 34:18 says 31:3,11 32:11,11 35:9 42:6 44:18 scattered 27:11 school 7:15 schools 7:18 seal 56:10 second 12:2 26:22 30:21 33:25 34:3 35:1 42:20,25 secretary 15:13 see 22:25 26:12 34:8,13 seeking 12:9 Seems 53:1 seen 23:20 26:25 29:19 Sego 1:14 55:4 56:19 selected 17:9 selling 47:20 51:3 senator 18:23 senior 50:8 service 9:14 20:21,23 28:11 services 3:5 50:10 set 56:8 seven 12:1,1 several 14:24 15:2,21 41:18 49:24 sharing 16:14 Sherri 1:14 7:4 10:2 55:4 56:19 short 15:18 47:19,21 show 7:2 9:19 10:5,16 11:4,14,19 15:4 16:15 17:25 18:19 19:20 20:19 21:9,14,21 22:1 22:13,17 23:9,17,23 24:4,10,14,19,23 25:4 25:12,17,24 26:6	siblings 43:21 side 8:5,13 Sidney 3:9,10,19,21,25 4:4,6,8,10,12 8:1,2,3 9:3 10:7,18 19:22 30:9 Sidney's 11:1 signature 54:15 55:16 significant 17:3 simply 44:25 since 20:25 sir 29:2 37:7 43:4 44:15 sisters 8:25 9:3 sitting 24:3 25:1,8,14 situation 45:8 sole 19:25 solicitations 51:4 some 6:9,17 8:18 12:7 15:3 23:15 25:22 27:6 36:12 somebody 10:23 22:10 someone 17:13,23 20:11 45:4,13,20 46:7 47:10 49:17 52:19 something 10:4 24:18 44:12 sometimes 7:16 33:10 son 26:22 son's 25:10,15,16 Soror 22:7 sororities 16:25 17:6 sorority 4:7 22:6 25:23 sorors 23:7 sorry 12:24 20:10,14 32:17 sort 24:8 47:20 South 6:12 23:16 SOUTHERN 1:7 57:11 speak 7:16,17 28:24 48:22 special 17:3 spoke 15:1,2,2 28:18 spoken 51:1 sponsors 8:18 Square 1:23 57:23 SS 55:1 standing 19:2 24:2 25:8 32:16 43:18,18,19,20 43:20,22,23 44:1,7,8 44:11 stands 37:6,14 39:22 start 18:24 started 16:3 41:14 starts 11:23 45:4 state 1:15 6:25 7:23 13:4,9 19:2 30:13 31:4 55:1 statement 13:13,16 14:4,7 30:25 31:9,23 32:5 States 1:1,7 3:5 57:5,10
--	---	--	--	--	---

<p>statue 3:16,22 4:14 14:16,18 15:20 21:17 stenographic 55:13 still 40:5 41:4 54:10 stipulated 6:12 story 15:18 street 1:24 2:10 16:7 57:24 striking 18:23 stuck 8:21 students 54:6 studied 29:17 subject 6:14 succeed 20:3 succeeded 17:4 successful 16:20 41:15 sufficient 19:2 32:16 43:20 suggest 44:20,25 45:6 45:22 46:6 47:12 suggests 14:12 Suite 1:23 2:4 57:2,24 sum 53:17 summary 21:13,25 53:17 supposed 29:6 Supreme 57:16 sure 37:19 47:23,23 48:2 51:17 54:16 surprise 27:6 surprised 12:15 15:17 17:20 surviving 50:8 swine 10:3 sworn 1:13 6:2 55:6</p> <hr/> <p style="text-align: center;"><b>T</b></p> <p>T 4:11 22:17 table 25:2,2,14 take 18:4 47:18,21 taken 1:15,19 55:8,12 57:18 talk 41:23 talking 23:4 28:13 47:17 Taylor 1:5 3:9,10,12,13 3:15,19,21,23,25 4:4 4:6,8,10,12 8:1,2,3,11 8:12,14,15,16 9:3,16 10:7 11:6,8,10,12,16 11:24 12:4,11,12,20 12:21 13:7,8,15 14:6 14:10,13,17,18,22 15:12,13 16:8,9 17:14 17:21 19:13,22 21:16 23:19 24:2,6,12,22 27:15,21,23,25 28:4,6 28:13 29:19,21,25 30:2,12,23 31:17,21 31:22 32:4,14 33:22 34:5 37:3,11,12,25</p>	<p>38:1,6,7,19,25 40:10 40:12,16,25 44:19,21 44:24 45:5,6,13,20,23 46:7 47:10,13 48:12 49:5,8,18 50:12 51:23 52:1,1,4,16,20 53:9 53:25 54:3 57:9 Taylor's 19:19 27:8 51:11 tell 6:2 7:17 11:21 12:8 15:8,18 24:5,11,20 29:7 33:7 42:1 53:6 55:6 terms 33:14 testified 6:4 testimony 6:20 28:19 29:9 33:20 55:15 thank 6:11 9:14 10:15 16:14 20:7 28:10 thanks 9:25 17:19 their 25:16 37:9 thing 16:3,9 21:5 47:20 51:9 things 12:7 14:1 20:5 30:16 32:3 51:4 think 11:23 14:8 17:5 19:14 20:8 23:2 24:21 33:9 42:15 43:22 44:11,22 45:3 50:20,23 third 52:7 Thirteen 11:2 though 28:12 42:7 thought 12:16 16:6 23:4 three 16:2 24:1 26:16 26:19,23 three-time 15:10,14 through 11:24 34:20,24 35:6,16 tied 29:18 time 7:16 10:11 21:11 27:13,19 31:7,8 34:14 34:16,18 38:23 50:7 54:17 55:10 today 6:13 12:4 19:8,10 21:4 28:19 50:24 together 27:13 29:19 told 48:21 51:16 Tolman 15:12,12,22 Tour 15:10 track 15:15 trademark 1:1,1 12:9 12:18,21 13:8,14,15 30:20,21 32:9,14,15 32:22 33:22,25 36:5 37:3,12 38:1,6,25 39:2 40:10,13,17 44:16 45:1 51:12 57:5,5 trademarks 14:11 32:3</p>	<p>44:20 travel 6:17 traveling 6:11 tree 11:22 28:18,20 trial 1:1,18 44:16 57:5 tribunal 6:15,23 trickled 50:21 trip 26:7 true 21:8 55:14 truth 6:2,3,3 55:6 try 13:2,2 51:14 trying 32:18 turn 51:5 turned 14:24 Turnpike 2:4 57:2 TV 15:1 two 1:23 16:2 43:2,10 57:23 two-dimensional 18:17 type 6:20 typewriting 55:13</p> <hr/> <p style="text-align: center;"><b>U</b></p> <p>U 4:13 23:9 Uh-huh 32:6 under 23:1 55:14 understand 13:23 28:21 36:24 39:18 40:15 41:17 42:9 46:11,17,21,22,23,24 understanding 14:1 33:2,7,15 44:5 understands 47:6 understood 47:3,9 Unfortunate 21:8 uniform 8:19,20 Uniformed 3:5 United 1:1,7 3:5 57:5 57:10 university 7:23,24 54:7 54:9 unlikely 53:5,5 unsuccessful 34:19,25 35:20 36:6,8 until 50:23 untrue 14:7,8 unveiling 14:16 use 8:7,7 13:8,15 14:6 27:23 28:2,5 33:4 37:2,11 38:1,6,13,22 38:22 39:2 40:9,16,19 40:20,22 44:19 45:9 45:21 46:8,8 49:13 51:11,14 52:4 53:8,24 used 6:15 45:24 46:1,4 uses 38:19 45:13,20 47:10 using 12:21 14:11 38:24 40:24 48:10,11 49:5,8,10 54:3 usually 51:5</p>	<p style="text-align: center;"><b>V</b></p> <p>v 1:4,10 4:15 6:1 23:17 57:8,13 valid 11:9 value 19:2 various 27:11,13 52:22 54:5 Velodrome 30:15 verify 11:7 versus 43:19 very 10:15 15:7 16:21 24:16 29:18 41:19 Virginia 7:23,23 visited 30:16 visual 18:16 voluntary 47:24</p> <hr/> <p style="text-align: center;"><b>W</b></p> <p>W 4:16 6:1 8:9,11,12 23:23 31:16,21 want 8:7 28:10 32:12 32:17 33:14 34:8 36:21 39:11,20 43:13 48:25 54:15 wanted 12:14 17:23 34:13 35:1 wants 46:7 war 9:9 wasn't 17:21 30:4 35:4 50:14 watch 22:12 way 11:7 38:14 Wayne 2:5 57:3 wear 8:20 Wedding 4:9 weeks 16:2 well 11:2 13:19 33:9,11 35:9 41:19 44:4 48:24 51:21 53:17 were 7:11,13 10:9 15:16,16 17:2 19:24 23:4 24:16,17 25:22 26:10,11 34:19,24 43:7,10 48:10 50:7,11 54:9 West 7:23,23 we'll 18:14,17 48:1 we're 13:25 18:14 28:13 47:17 48:7 51:20 54:12 we've 12:3,3 24:25 26:22 38:16 WHEREOF 56:8 while 26:11 whole 6:3 12:3,4 22:23 22:23 wide 36:17 wife 23:25 25:8,10,15 25:15,16 26:1,15,23 wife's 26:2,8 window 16:6</p>	<p>winner 15:10 witness 1:13 36:14 56:8 Wonderful 23:1 Worcester 10:10 14:16 14:22 15:25 21:17 word 33:4,9,10,15 words 18:25 23:1 40:24 43:2 wore 8:19 work 42:21 works 41:15 51:23 52:16,18 World 19:16 worth 20:5 wouldn't 41:15 would-be 52:22 write 17:14 49:21 writes 49:17,19 written 49:24 50:7 wrote 50:2</p> <hr/> <p style="text-align: center;"><b>X</b></p> <p>X 4:17 24:4</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <p>Y 4:18 24:10 yeah 7:8 year 48:14,15,17 years 9:9 22:7,8 young 21:2 24:17 younger 23:22</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <p>Z 4:19 24:14</p> <hr/> <p style="text-align: center;"><b>\$</b></p> <p>\$2500 20:3,4,5</p> <hr/> <p style="text-align: center;"><b>0</b></p> <p>07470 2:5 57:3</p> <hr/> <p style="text-align: center;"><b>I</b></p> <p>I 56:25 1:00 1:16 1:09-CV-0275-WTL-... 1:10 57:13 10 3:4,9,10 10-1-86 57:17 100 23:1 100th 4:5,8,11 21:24 22:3,5,20,21 24:25 27:14 11 3:12,13,15 11th 10:21 127 2:10 15 3:16 16 3:17 18 3:18,20 19 3:25 21:23 1904 10:21 1932 7:12 11:17</p>
--	---	---	---	--

1984 9:13  
 1994 26:21  
 1995 26:1  
 1996 18:8

---

2

2:20 54:18  
 20 3:21  
 20th 22:3  
 2000 48:15,17  
 2004 21:23 22:18 27:14  
 2005 11:3 20:18 27:7  
 2008 14:16,20 23:10  
 2009 1:16 56:12 57:18  
 2016 56:25  
 21 3:23 4:4,6 44:18  
 21st 7:12  
 210 2:4 57:2  
 22 4:8,10,12 23:10  
 23 4:14,15,16 22:18  
 23rd 56:10  
 24 4:17,18,19,20,21  
 25 4:22,23,24,25  
 251 1:24 57:24  
 26 5:14,16,18,20  
 2701247 1:5 57:8  
 2791896 1:4 57:8  
 28 2:25 18:8

---

3

30 9:8  
 30th 9:13  
 317 1:25 57:25

---

4

4 3:17  
 401 2:4 57:2  
 46204 1:24 2:10 57:24

---

5

5 57:18  
 51 31:11

---

6

6 2:22  
 6th 1:16  
 60 20:24  
 631-0940 1:25 57:25

---

7

7 3:6  
 70 20:24  
 72 3:17

---

9

9 3:7  
 90th 26:21  
 9020 1:17  
 92050965 1:4 57:7  
 940 1:23 57:24  
 96818 31:13