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

Proceeding	92050965
Party	Plaintiff Dallas C. Brown Jr.
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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.

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APPEARANCES

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FOR MR. COURTNEY BISHOP:

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LEE COSSELL KUEHN & LOVE, LLP
127 East Michigan Street
Indianapolis, Indiana 46204

ALSO PRESENT:

Karen Brown Donovan
Courtney Bishop

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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.

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?

- 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?

- 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 your 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.

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,

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

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.

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

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

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

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

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

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. BURSIK: 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

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 Q 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

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

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 attenders 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.

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?

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

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.

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.

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

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

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

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

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,

1 did you file the second one because you wanted
2 another opportunity?

3 MR. BURSİK: 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. BURSİK: The plaintiff is not family
8 members.

9 MR. GADSON: Well, the petition says she had
10 complete authority.

11 MR. BURSİK: Correct.

12 MR. GADSON: And General Brown agreed with
13 that.

14 MR. BURSİK: 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. BURSİK: I object. Don't answer that.

25 Another attempt implies he had the first

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.

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

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. BURSİK: I object to form. That's not
6 what the complaint says.

7 MR. GADSON: That's my question, though.

8 MR. BURSİK: 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. BURSIK: 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. BURSIK: 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. BURSIK: Objection. Legal question.

4 MR. GADSON: Well, he gave a legal answer.

5 MR. BURSIK: 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. BURSIK: 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. BURSIK: Can you let him answer?

18 MR. GADSON: I'm asking a new question.

19 MR. BURSIK: 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. BURSIK: 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. BURSIK: Could you restate that
11 question? I didn't understand that question. Can
12 you read that back?

13 (Question read.)

14 MR. BURSIK: 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. BURSIK: Do you understand that
18 question?

19 THE DEPONENT: No, and I'm reasonably
20 cognizant.

21 MR. BURSIK: 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

1 deponent here. General Brown is and --

2 MR. BURSIK: 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. BURSIK: 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. BURSIK: Sure, sure.

24 A A voluntary bicycle club, what difference would it
25 make?

1 MR. GADSON: So we'll go off the record now.

2 MR. BURSIK: 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. BURSIK: Just speak about what you
23 remember.

24 MR. GADSON: Well, I can --

25 MR. BURSIK: Or you can ask him if you want.

- 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.

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. BURSIK: 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 DALLAS COVERDALE BROWN, JR.

24

25

STATE OF INDIANA)
) SS:
COUNTY OF JOHNSON)

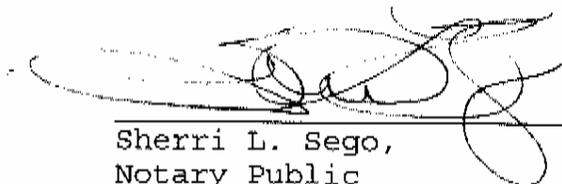
I, Sherri L. Segó, Notary Public in and for Johnson County, Indiana, do hereby certify that the deponent was by me sworn to tell the truth in the aforementioned matter;

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.

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

A handwritten signature in black ink, appearing to read "Sherri L. Segó", is written over a horizontal line.

Sherri L. Segó,
Notary Public
Residing in Johnson County

My Commission Expires:
June 1, 2016