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

Proceeding	91216605
Party	Defendant Ted Wong JKD, LLC
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

DEREK A. LOPEZ, an Individual,	)	
	)	
Opposer,	)	Opposition Nos.: 91216672, 91216605,
	)	91216538
vs.	)	
	)	Serial Nos.: 85/310,210, 85/310,234,
TED WONG JKD, LLC,	)	85/310,186
	)	
Applicant.	)	

**APPLICANT’S SUPPLEMENTAL PRE-TRIAL DISCLOSURES**

Pursuant to the Pre-trial Orders of August 30, 2016, Applicant TED WONG JKD, LLC (“Wong”), by counsel, Theodore J. Minch, hereby provides the following pre-trial disclosures.

Preliminarily, Derek A. Lopez, an individual, may be referred to hereinafter as “Opposer;” the subject mark of these proceedings, namely, TED WONG JEET KUNE DO and Design shall be referred to hereinafter as the “Mark;” the federal trademark applications for the Mark which are the subject of these proceedings, specifically United States trademark applications Serial Numbers 85/310,210, 85/310,234, and 85/310,186 in International Classes 025, 041, and 045 filed by Wong on or about the May 2, 2011 and subsequently published for opposition in the U.S. Patent and Trademark Office Official Gazette of January 21, 2014 shall be referred to hereinafter, collectively, as the “Applications;” and opposition numbers 91216672, 91216605, and 91216538 filed by Opposer as to the Applications which oppositions form the subject matter of this dispute shall be referred to hereinafter, collectively, as the “Oppositions.”

**Persons Likely To Have Discoverable Evidence:**

The following persons may have discoverable evidence that the Wong intends to use to support its claims and defenses at issue in this Case:

1. Krina Wong  
Ted Wong JKD, LLC  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Ms. Wong is Mr. Wong's widow and is principal of Ted Wong JKD, LLC and is familiar with Opposer and the claims Opposer has made in this litigation. The scope of her testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; relationship between the late Ted Wong and Opposer; information relating to the core and fundamental claims raised by Opposer in the Oppositions; relationship between the late Ted Wong and Opposer; the establishment and organization of Wong; the relationship between Opposer and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers; relationship between Mr. Wong and Wong; the relationship and dealings between Mr. [Ted] Wong and the late Bruce Lee as related to the Mark.*
  
2. Brice Wong  
Ted Wong JKD, LLC  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Mr. Wong is Mr. Wong's son, is a corporate officer of Ted Wong JKD, LLC, and is familiar with Opposer and the claims Opposer has made in this litigation. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; information relating to the core and fundamental claims raised by Opposer in the Oppositions; relationship between the late Ted Wong and Opposer; the establishment and organization of Wong; the relationship between Opposer and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers; relationship between Mr. Wong and Wong; the relationship and dealings between Mr. [Ted] Wong and the late Bruce Lee as related to the Mark.*

3. Bill Matucci  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Mr. Matucci was an associate of Mr. Wong's and Opposer's and was familiar to both Mr. Wong and Opposer. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; information relating to the core and fundamental claims raised by Opposer in the Oppositions; the relationship between Opposer and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers.*
  
4. Victor Colon  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Mr. Colon was an associate of Mr. Wong's and Opposer's and was familiar to both Mr. Wong and Opposer. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; information relating to the core and fundamental claims raised by Opposer in the Oppositions; the relationship between Opposer and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers.*
  
5. Bob Landers  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Mr. Landers was an associate of Mr. Wong's and Opposer's and was familiar to both Mr. Wong and Opposer. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; information relating to the core and fundamental claims raised by Opposer in the Oppositions; the relationship between Opposer and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers.*

6. Shannon Lee  
Bruce Lee Enterprises, LLC  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Ms. Lee is the principal of Bruce Lee Enterprises, LLC. The scope of her testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark; the establishment and organization of Wong; the relationship and dealings between Mr. [Ted] Wong and the late Bruce Lee as related to the Mark; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers; relationship between Mr. Wong and Wong.*
  
7. Kris Storti  
Bruce Lee Enterprises, LLC  
c/o Sovich Minch, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46265  
Telephone: 317.335.3601  
*Subjects (non-exclusive): Mr. Storti is a corporate office holder of Bruce Lee Enterprises, LLC. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark; the establishment and organization of Wong; the relationship and dealings between Mr. [Ted] Wong and the late Bruce Lee as related to the Mark; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers; relationship between Mr. Wong and Wong.*
  
8. Derek A. Lopez  
c/o Jon M. Gibbs  
LOWNDES, DROSDICK, DOSTER, KANTOR & REED, P.A.  
215 North Eola Drive  
Orlando, Florida 32801  
*Subjects (non-exclusive): Mr. Lopez is the Opposer in this Case. The scope of his testimony will include but may not necessarily be limited to the design, development, marketing, licensing, and use by Wong of the Mark as contained in the Applications; information relating to the core and fundamental claims raised by Opposer in the Oppositions; the relationship between himself and Mr.[Ted] Wong; the relationship and dealings between Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers.*

## **II. Documents and Things Potentially Used in Support:**

The following categories of documents may be used by Wong to support its claims and / or defenses in this matter. Upon information and belief, all documents are in the custody of Wong at its attorney's offices located at 10500 Crosspoint Boulevard, Indianapolis, Indiana, in

the possession of Wong's and / or Opposer's counsel, in the possession of Opposer, and or in the possession of the Opposer's counsel, both present and former.

1. Documents relating to the registration of the late Ted Wong under §3344.1 of the California Code (i.e. – the California Right of Publicity Statute).

2. Documents relating to the probate of the estate of the late Ted Wong under California law.

3. Documents relating to the chain of transfer of the rights in and to the Mark, including but not limited to the Ted Wong Right of Publicity and other ancillary though related intellectual property rights including certain trademarks and copyrights associated with the late Ted Wong.

4. Wong's corporate formation documents.

5. Any documents that may be related to the organization and / or structure of Opposer and / or Opposer's so called ownership and / or dominion and / or control of the Mark.

6. Any and all documents that may be used by and / or relied upon by Opposer in proving the claims set forth in the Notice of Opposition filed by Opposer in this action.

7. Documents, including but not limited to the agreements themselves, relating to Opposer's design, development, marketing, promotion, and / or use of the Mark and / or the various intellectual property rights associated with the late Ted Wong and / or Bruce Lee.

8. Any and all documents supporting and / or associated with the defenses, affirmative or otherwise, asserted by Wong in this action.

9. Any and all news articles related to the formation and / or establishment of any entities associated with Opposer and / or Wong.

10. Any and all billings for legal services rendered and costs advanced to Opposer as associated with this litigation.

11. Any and all royalty reports, bank statements, and / or cancelled checks relating to payments made by Opposer for the design, development, marketing, promotion, and / or use of the Mark and / or the various intellectual property rights associated with the late Ted Wong and / or Bruce Lee.

12. All pleadings and other material filed by Opposer and / or Wong in this and / or any other related actions.

13. Correspondence between Wong, Mr. Wong, and / or Opposer, including but not limited to communications between the parties regarding the design, development, marketing, promotion, and / or use of the Mark.

14. Correspondence between Wong, Mr. Wong, Krina Wong, Bill Matucci, Victor Colon, and / or Bob Landers and / or Opposer, including but not limited to communications between the afore-referenced parties and non parties regarding the design, development, marketing, promotion, and / or use of the Mark.

15. Any and all agreements between Opposer, Mr. Wong, and / or Wong for the design, development, marketing, promotion, licensing, and / or use of the Mark, including but not limited to use of the Ted Wong and / or Bruce Lee publicity rights and other ancillary though related intellectual property rights including certain trademarks and copyrights associated with the late Ted Wong and / or Bruce Lee.

16. Office memoranda and policy documents relating to the relationship (and / or the termination thereof) between Mr. Wong, Wong, and / or Opposer.

17. Office memoranda and policy documents relating to the licensing of the Ted Wong and / or Bruce Lee publicity rights and other ancillary though related intellectual property rights including certain trademarks and copyrights associated with the late Ted Wong and / or Bruce Lee.

18. Any and all documents in the possession and / or known to the Tatyana Parties, its agents, officers, and / or assigns, as pertaining to any proceedings in any venue associated with Opposer, whether Opposer initiated and / or defended any such action.

19. Any and all documents relating to Opposer's activities in the prosecution of third party unauthorized users of the Mark and / or publicity rights of the late Ted Wong and / or Bruce Lee and other ancillary though related intellectual property rights including certain trademarks and copyrights associated with the late Ted Wong and / or Bruce Lee.

20. Any and all documents relating to Opposer's commercial activities associated with any claimed property rights associated with the Mark and / or the late Ted Wong.

21. Any and all survey evidence relating to the marketability, consumer recognition, consumer association, etc. of the Mark and / or the late Ted Wong and the deceased personality and / or trademark rights associated with the late Ted Wong.

22. Any and all valuations, professional or projected, of the so-called deceased personality and / or trademark rights associated with the Mark itself and / or late Ted Wong in the possession of Opposer.

DATED: January 16, 2017  
Indianapolis, Indiana

SOVICH MINCH, LLP  
*/s/ Theodore J. Minch*

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Theodore J. Minch, Attorney No. 18798-49  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46256  
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*Attorneys for Applicant Ted Wong JKD, LLC*



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of Applicant's Initial Disclosures was served on the Opposer, via service of counsel, Jon M. Gibbs, LOWNDES, DROSDICK, DOSTER, KANTOR & REED, P.A., 215 North Eola Drive Orlando, Florida 32801, jon.gibbs@lowndes-law.com, by first class and electronic mail on this 16<sup>th</sup> day of January, 2017.

/theodorejminch/  
Theodore J. Minch (IN - #18798-49)  
Sovich Minch, LLP