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

Proceeding	91238706
Party	Defendant Edison Chinese Chorus Inc. AKA Xiang Yin Chorus or Xiang Yin He Chang Tu-an
Correspondence Address	CHENG Q SONG SONG LAW FIRM 1 WINDY HILL ROAD GREEN BROOK, NJ 08812 UNITED STATES chengqsong@gmail.com, chengqsong@yahoo.com 219-928-6191
Submission	Motion to Compel Discovery or Disclosure
Filer's Name	Cheng Song
Filer's email	chengqsong@gmail.com
Signature	/s/Cheng Song
Date	03/30/2020
Attachments	Motion to Compel for Reply.pdf(79793 bytes) Exhibit 1 Second Set of Interrogatories.pdf(185512 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Opposition No. 91238706
Application Serial Nos. 87566170 and 87538374

Xiang Yin He Chang Tuan Inc.
Opposer

Vs.

Edison Chinese Chorus Inc.
AKA Xiang Yin Chorus or
Xiang Yin He Chang Tuan
Applicant

MOTION TO COMPEL FOR REPLY

Comes now Applicant, Edison Chinese Chorus Inc., AKA Xiang Yin Chorus or Xiang Yin He Chang Tuan, by counsel, Cheng Q. Song, and for its Motion to Compel for compelling Opposer to promptly reply to Applicant's second set of discovery requests, and as grounds states as follows:

1. Applicant served on Opposer three sets of discovery requests so far. The second discovery requests were served on Opposer on June 19, 2019 but they were never answered. (Exhibit 1)
2. This is the third time that Opposer did not respond to the court proceedings timely. The first two times when Opposer failed to timely respond were for an order issued on March 2, 2018, and the first discovery request on 5/6/2019.
3. Applicant's second set of discovery requests was served on Opposer via email as always on June 19, 2019. The court proceedings were suspended as of June 26, 2019 and resumed on January 29, 2020. Therefore, the due date for the second set of discovery requests was February 21, 2020.

Respectfully submitted,

By: /s/Cheng Q. Song

Cheng Q. Song, Ph.D. J.D.
Attorney for Applicant
Dated: March 30, 2020

Certificate of Service

I hereby certify that a true and complete copy of the foregoing MOTION TO COMPEL FOR REPLY has been served on H. Danny Kao, KAO & Associates, Counsel for Opposer, by forwarding said copy on March 30, 2020, via email to dkao@kaolawus.com.

Signature: /s/Cheng Q. Song

Date: March 30, 2020

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Opposition No. 91238706
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Xiang Yin He Chang Tuan Inc.
Opposer

v.

Edison Chinese Chorus Inc.
Applicant

Applicant's Second Set of Interrogatories to Opposer

Applicant, Edison Chinese Chorus Inc., hereby requests that Opposer responds to the following Interrogatories within thirty (30) days from the date of service. Applicant reserves the right to serve additional Interrogatories as appropriate. In the hereinbelow Interrogatories, Trademark means “乡音合唱团” and/or “乡音合唱團”, which were submitted in Application Serial Nos. 87566170 and 87538374.

Interrogatory No. 21: Request No. 21: Who was the student as mentioned in Opposer's Replies to Applicant's First Set of Interrogatories to Opposer “who proposed forming a chorus group in early 2001.” (second paragraph, line 2, page 2) ?

Respectfully submitted:

By: /s/Cheng Q. Song

Cheng Q. Song, Ph.D. J.D.
Attorney for the Applicant
Dated: June 19, 2019

Certificate of Service

I hereby certify that a true and complete copy of the foregoing Applicant's First Set of Interrogatories to Opposer has been served on H. Danny Kao, KAO & Associates, Counsel for the Opposer, by forwarding said copy on June 19, 2019, via email to dkao@kaolawus.com.

Signature: /s/Cheng Q. Song