

ESTTA Tracking number: **ESTTA1045995**

Filing date: **03/31/2020**

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

Proceeding	91238706
Party	Plaintiff Xiang Yin He Chang Tuan Inc.
Correspondence Address	H DANY KAO KAO & ASSOCIATES PC 38-08 UNION STREET SUITE 12E FLUSHING, NY 11354 UNITED STATES dkao@kaolawus.com 516-305-3717
Submission	Opposition/Response to Motion
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Date	03/31/2020
Attachments	Opposer Response to to Motion to Compel Correction.pdf(74063 bytes)

IN THE UNITED STATES PATENT AND
TRADEMARK OFFICE
Before the 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

v.

Edison Chinese Chorus Inc.
Applicant

**Opposer's Response to Applicant's Motion to Compel
For Correction of Discovery Requests**

Opposer, Xiang Yin He Chang Tuan Inc., hereby responds to the Applicant's motion to compel for correction of discovery requests.

Applicant's motion states that two of Opposer's discovery requests (Applicant's Exhibits 1 and 3) contained a typographical error identifying Opposer as "Columbia Trading Corp." Despite the typographical error, Applicant represents that it provided responses to the requests. Opposer contends that Applicant's motion was unnecessary because the typographical errors were obvious from the caption and context of the requests.

Opposer confirms that these were indeed typographical errors, that Applicant knew they were typographical errors, and that Applicant has been neither harmed nor confused by the typographical errors.

Respectfully submitted:

By: /s/ H. Danny Kao
H. Danny Kao, Ph.D. J.D.
Attorney for the Opposer

Dated: March 31, 2020

Certificate of Service

I hereby certify that a true and complete copy of the foregoing Opposer's Response to Applicant's Motion to Compel For Correction of Discovery Requests has been served on Cheng Q. Song, Counsel for the Opposer, by forwarding said copy on March 31, 2020, via email to chengqsong@gmail.com.

Signature: /s/ H. Danny Kao