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

Proceeding no.	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 Primary email: dkao@kaolawus.com Secondary email(s): drhoads@rroadslegal.com 516-305-3717
Submission	Other Motions/Submissions
Filer's name	H. Danny Kao
Filer's email	dkao@kaolawus.com
Signature	/H. Danny Kao/
Date	03/18/2022
Attachments	Opposer_Amended_Notice_of_Election_To_take_oral_cross-examination.pdf (197799 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 Amended Notice That It Has Elected To Take  
Oral Cross-Examination Of Seven Of Applicant's Declarants**

Comes now the Opposer, Xiang Yin He Chang Tuan Inc. ("Opposer" or "Xiang Yin"),  
by counsel, H. Danny Kao, to hereby submit the following amended notification.

**Amended Notification Of Election To Take Oral Cross-Examination**

The Board's March 17, 2022 Order stated that "Opposer is allowed FIVE (5) DAYS in  
which to file and serve an amended notice(s) of election to take oral cross-examination of  
Applicant's declarants." TTABVUE 73. Opposer elects to take oral cross-examination of seven  
of Applicant's remaining declarants, namely Daping Fan, Chia-Chi Tsui, Tang Jian, Min Li, Oi  
Mo, Yu Liu, and Yuejin Li from TTABVUE 54.

Attached hereto as Exhibit A is Opposer Xiang Yin He Chang Tuan Inc.'s First Notice of  
Deposition To Take The Oral Cross-Examination Depositions Of Daping Fan, Chia-Chi Tsui  
and Tang Jian. The date and time of the depositions shall be on March 25, 2022 at 1:00pm,  
2:00pm and 3:00pm, respectively. The place of the depositions shall be at each of the  
Applicant's and/or witnesses' convenience, and it shall be by telephone.

Also attached hereto as Exhibit B is Opposer Xiang Yin He Chang Tuan Inc.'s Second Notice of Deposition To Take The Oral Cross-Examination Depositions Of Min Li, Oi Mo, Yu Liu, and Yuejin Li. The date and time of the depositions shall be on April 1, 2022 at 1:00pm, 2:00pm, 3:00pm and 4:00pm, respectively. The place of the depositions shall be at each of the Applicant's and/or witnesses' convenience, and it shall be by telephone.

Respectfully submitted,

By: /s/ H. Danny Kao

H. Danny Kao, PhD, JD

KAO & ASSOCIATES, PC

38-08 Union Street, Ste 12E Flushing, NY 11354

Tel: (516) 305-3717 Fax: (888) 315-4262 [dkao@kaolawus.com](mailto:dkao@kaolawus.com)

Attorney for the Opposer

Dated: March 18, 2022

#### **Certificate of Service**

I hereby certify that a true and complete copy of the foregoing notice has been served on Cheng Q. Song, Counsel for the Applicant, by forwarding said copy on March 18, 2022, via email and electronic docket filing in this opposition to [chengqsong@gmail.com](mailto:chengqsong@gmail.com).

Signature: /s/H. Danny Kao

Date: March 18, 2022

**EXHIBT A**

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

March 18, 2022

Xiang Yin He Chang Tuan Inc.,  
Opposer

v.

Edison Chinese Chorus Inc.,  
Applicant

**OPPOSER XIANG YIN HE CHANG TUAN INC.'S  
FIRST NOTICE OF DEPOSITION TO TAKE THE  
ORAL CROSS-EXAMINATION DEPOSITION OF  
DA PING FAN, CHIA-CHI TSUI AND TANG JIAN**

**PLEASE TAKE NOTICE**, that the Plaintiffs shall take the depositions upon oral cross-examination of three declarants of Applicant, namely Da Ping Fan, Chia-Chi Tsui and Tang Jian, for use in this opposition. The depositions shall commence according to the following schedule:

<b><u>Witness</u></b>	<b><u>Time</u></b>
Da Ping Fan	Friday, March 25, 2022 at 1:00pm
Chia-Chi Tsui	Friday, March 25, 2022 at 2:00pm
Tang Jian	Friday, March 25, 2022 at 3:00pm

As these individuals are declarants on behalf of Applicant, Applicant has access to their address and other contact information.

Each deposition shall take place by telephonic means before a duly certified court reporter authorized to administer oaths under the parties' previous agreement, wherein the parties agree that the reporter is not required to be at the same location as the witness or the parties, the reporter can administer the oath over the telephone, and the witness is not required to sign the transcript in front of the reporter or a notary. Counsel for Applicant is requested to provide (or make sure they already have) each witness a copy of their declaration and the exhibits cited therein for use in the deposition.

Date: March 18, 2022

Respectfully submitted,

s/ H. Danny Kao

By: H. Danny Kao, PhD, Esq.  
KAO & ASSOCIATES, PC  
38-08 Union Street, STE 12E  
Flushing, NY 11354  
Tel: (516) 305-3717  
Fax: (888) 315-4262  
dkao@kaolawus.com

Attorneys for Opposer Xiang Yin He Chang Tuan Inc.

#### Certificate of Service

I hereby certify that a true and complete copy of the foregoing OPPOSER XIANG YIN HE CHANG TUAN INC.'S FIRST NOTICE OF DEPOSITION TO TAKE THE ORAL CROSS-EXAMINATION DEPOSITION OF DA PING FAN, CHIA-CHI TSUI AND TANG JIAN has been served on Cheng Q. Song, Counsel for the Opposer, by forwarding said copy March 18, 2022, vis email to chengqsong@gmail.com and chengqsong@yahoo.com.

Signature: /s/H. Danny Kao

Date: March 18, 2022

IN THE UNITED STATES PATENT AND  
TRADEMARK OFFICE  
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P.O. Box 1451  
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March 18, 2022

Xiang Yin He Chang Tuan Inc.,  
Opposer

v.

Edison Chinese Chorus Inc.,  
Applicant

**OPPOSER XIANG YIN HE CHANG TUAN INC.'S  
SECOND NOTICE OF DEPOSITION TO TAKE THE  
ORAL CROSS-EXAMINATION DEPOSITION OF  
MIN LI, OI MO, YU LIU AND YUEJIN LI**

**PLEASE TAKE NOTICE**, that the Plaintiffs shall take the depositions upon oral cross-examination of four declarants of Applicant, namely Min Li, Oi Mo, Yu Liu, and Yuejin Li, for use in this opposition. The depositions shall commence according to the following schedule:

<b><u>Witness</u></b>	<b><u>Time</u></b>
Min Li	Friday, April 1, 2022 at 1:00pm
Oi Mo	Friday, April 1, 2022 at 2:00pm
Yu Liu	Friday, April 1, 2022 at 3:00pm
Yuejin Li	Friday, April 1, 2022 at 4:00pm

As these individuals are declarants on behalf of Applicant, Applicant has access to their address and other contact information.

Each deposition shall take place by telephonic means before a duly certified court reporter authorized to administer oaths under the parties' previous agreement, wherein the parties agree that the reporter is not required to be at the same location as the witness or the parties, the reporter can administer the oath over the telephone, and the witness is not required to sign the transcript in front of the reporter or a notary. Counsel for Applicant is requested to provide (or make sure they already have) each witness a copy of their declaration and the exhibits cited therein for use in the deposition.

Date: March 18, 2022

Respectfully submitted,

s/ H. Danny Kao

By: H. Danny Kao, PhD, Esq.  
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38-08 Union Street, STE 12E  
Flushing, NY 11354  
Tel: (516) 305-3717  
Fax: (888) 315-4262  
dkao@kaolawus.com

Attorneys for Opposer Xiang Yin He Chang Tuan Inc.

#### Certificate of Service

I hereby certify that a true and complete copy of the foregoing OPPOSER XIANG YIN HE CHANG TUAN INC.'S SECOND NOTICE OF DEPOSITION TO TAKE THE ORAL CROSS-EXAMINATION DEPOSITION OF MIN LI, OI MO, YU LIU AND YUEJIN LI has been served on Cheng Q. Song, Counsel for the Opposer, by forwarding said copy March 18, 2022, vis email to chengqsong@gmail.com and chengqsong@yahoo.com.

Signature: /s/H. Danny Kao

Date: March 18, 2022