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

Proceeding	91242958
Party	Defendant Anthony L. Jones
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Submission	Other Motions/Papers
Filer's Name	Anthony L. Jones
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Signature	/Anthony L. Jones/
Date	10/15/2020
Attachments	ajones pretrial disclosure.pdf(115243 bytes )

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

James A. Conway, Rohan Campbell,	)	
Yusuf A. Boyd,	)	
	)	
Opposers,	)	Opposition No. 91242958
v.	)	Serial No. 87576804
	)	
Anthony L. Jones,	)	Mark: MASONIC RIDERS,
	)	FAITH, CHARITY, BIKER
	)	LOVE, HOPE
Applicant.	)	

**APPLICANT/DEFENDANT’  
SUPPLEMENTAL PRETRIAL DISCLOSURES**

Pursuant to 37 C.F.R. § 2.121(e), TBMP § 702.01 and Federal Rule of Civil Procedure 26(a)(3), Applicant/Defendant Anthony L. Jones (“Applicant” or “Defendant”), hereby provide the following Supplemental Pretrial Disclosures to Opposers/Plaintiffs, James A. Conway, Rohan Campbell, and Yusuf A. Boyd (“Opposers” or “Plaintiffs”). Applicant also reserve the right to amend, supplement or otherwise revise these Supplemental Pretrial Disclosures.

**I. Identification of Witnesses**

A. During their Trial Period, Defendant intend to take testimony from at least the following witnesses:

1. Quentin Giles – Past National President, Masonic Riders M.C.  
4973 Morraine St, Waldorf, MD 20602, (808) 382-5801,

quentin.giles@opm.gov. Mr. Giles is an Original Member of the Masonic Riders M.C. Hawaii Chapter and former National President prior to Mr. Anthony Jones being appointed as its National President. Mr. Giles has knowledge of the creation and ownership of MRMC, its business structure, ownership, and leadership of the MRMC at all times relevant during this dispute, patch design and history of the creation, adoption and use. Mr. Giles is knowledgeable about the use or non-use of Applicant's mark by Applicant, the use of Plaintiffs' Trademarks by Plaintiffs, and the subject matters.

2. Kevin Searcy - Masonic Riders M.C., Augusta, GA, President. 4769 Billie J Drive, Augusta, GA 30908, (706) 288-5555, kvnjsrcy@yahoo.com. Mr. Searcy is an Original Member of the Masonic Riders M.C. Augusta Chapter and former National Vice President prior to Mr. Anthony Jones being appointed as its National Vice President. Mr. Searcy has knowledge of the creation and ownership of MRMC, its business structure, ownership, and leadership of the MRMC at all times relevant during this dispute, patch design and history of the creation, adoption and use. Mr. Searcy is knowledgeable about the use or non-use of Applicant's mark by Applicant, the use of Plaintiffs' Trademarks by Plaintiffs, and the subject matters.

3. Randell Robinson – Masonic Riders M.C. Jacksonville, NC President, 207 Knoll Way Hubert, NC 28539, (910) 381-0033, [Dominologi@yahoo.com](mailto:Dominologi@yahoo.com). Mr. Robinson has knowledge of the creation and ownership of MRMC, its business structure, ownership, and leadership of the MRMC at all times relevant during this dispute, patch design and history of the creation. Mr. Robinson is knowledgeable about the use or non-use of Applicant's mark by Applicant, the use of Plaintiffs' Trademarks by Plaintiffs, and the subject matters.

4. Ambroga Carson – Masonic Riders M.C. Augusta, Ga, Sgt At Arms- 5250 Kate Cove Trussville, Al 35173, (843)-263-1121, [ACarson0908@aol.com](mailto:ACarson0908@aol.com). Mr. Carson has knowledge of the creation and ownership of MRMC, its business structure, ownership and leadership of the MRMC at all times relevant during this dispute, patch design and history of the creation Mr. Carson is knowledgeable about the use or non-use of Applicant's mark by Applicant, the use of Plaintiffs' Trademarks by Plaintiffs, and the subject

5. Anthony L. Jones Past National President, Masonic Riders M.C. 3215 Rose Petal Lane Powder Springs, Ga 30127 (404) 324-6162, [Anthony.l.jones3@gmail.com](mailto:Anthony.l.jones3@gmail.com). Mr. Jones is knowledgeable about his Use or non-use of Applicant's trademark, U.S. Application Serial No. 87576804 ('Applicant's Trademark'), the use of Plaintiffs

Trademarks by Plaintiffs, and other subject matters contained in his answer and any other statements submitted or relied upon by Plaintiffs.

B. During their Rebuttal Period, Plaintiffs may take testimony from one or more of the following witnesses:

1. Any witness from whom testimony is taken in Plaintiff's 30-Day Trial. Period or has otherwise been identified as a witness by Plaintiffs including but not limited to:
2. Yusuf Ali Boyd – Founder of the Masonic Riders Motorcycle Club (“MRMC”). 10646 Ashford Cir. Waldorf, MD 20603, (202) 365-6507 [mister\\_boyd@hotmail.com](mailto:mister_boyd@hotmail.com). Mr. Boyd has knowledge of The creation of MRMC, its business structure and leadership of the MRMC at all times relevant during this dispute of Applicant's Trademark, U.S. Applicant Serial No. 8757604 (“Applicant's Trademark”) and any other written statements submitted or relied upon by Plaintiffs in this matter.
3. James Anthony Conway – Founder of MRMC. 15073 Copper Turtle Place Woodbridge, VA 22193, (703) 731-3609, [conwayja@hotmail.com](mailto:conwayja@hotmail.com). Mr. Conway has knowledge of the creation of MRMC, its business structure And leadership at all times relevant during this dispute of Applicant's Trademark. U.S. Applicant Serial No 8757604 (“Applicant's Trademark”) and any other written statements submitted or relied upon by Plaintiffs in this matter.

4. Rohan Sean Campbell – Founder of MRMC. CMR 469, Box 934, APO AE 09227, (817) 704-0009, [campbellrohan2004@gmail.com](mailto:campbellrohan2004@gmail.com). Mr. Campbell has knowledge of the creation of MRMC, its business structure and leadership at all times relevant during this dispute of Applicant’s Trademark U.S. Applicant Serial No 8757604 (“Applicant’s Trademark”) and any other written statement submitted or relied upon by Plaintiffs in this matter.
5. Any witness on Plaintiff’s witness list
6. Any current and former member of the MRMC
7. Any current and former applicant for membership in MRMC
8. Any custodians of records necessary to authenticate documents

## II. Identification of Exhibits

Pursuant to 37 C.F.R. § 2.121(e), TBMP § 702.01 and Federal Rule of Civil

Procedure 26(a)(3), Defendant may use some or all of the following documents and exhibits

during their Trial Period:

A. All attachments to Plaintiffs’ Notice of Opposition in the captioned matter dated August 11, 2018, TTAB Dkt. No. 1.

B. All documents relating to Plaintiffs’ Trademarks including the file history with the US Patent and Trademark Office (“USPTO”).

C. All documents relating to Applicant’s Trademark including the file history with the USPTO.

D. All documents included in Plaintiffs’ filings with the TTAB in the captioned matter on September 4, 2019, TTAB Docket Nos. 18 and 19.

E. By-laws of the MRMC first promulgated in 2007 and amended in 2017.

F. All documents regarding the creation, adoption, use by Plaintiffs and ownership of Plaintiffs' Trademarks.

G. All documents relating to the MRMC's account with Allstar Sports Inc. including but not limited to logo files, associated patches and "colors", and list of authorized MRMC contacts.

H. All documents regarding the ownership, membership and leadership of the MRMC during all times relevant to the instant dispute.

I. Plaintiffs' Answer (Dkt. 4) and all exhibits thereto:

Pursuant to 37 C.F.R. §2.121(e), TBMP § 702-01 and Federal Rule of Civil Procedure 26(a)(3). Defendants reserve the right to use other documents and exhibits during the Trial Period.

Dated: October 15, 2020


Respectfully,

/s/Anthony L. Jones

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2020, a true and correct copy of the  
foregoing APPLICANT/DEFENDANT SUPPLEMENTAL PRETRIAL  
DISCLOSURES was served upon:

Opposer Attorney via email:  
Nicole D. Galli  
[ndgalli@ndgallilaw.com](mailto:ndgalli@ndgallilaw.com)



Anthony L. Jones



