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Filing date: **07/25/2017**

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

Proceeding	91228868
Party	Plaintiff Devil's Disciples MC
Correspondence Address	SUNITA KONERU 2273 TURK BLVD SAN FRANCISCO, CA 94118 UNITED STATES Email: suni.koneru@gmail.com
Submission	Testimony For Plaintiff
Filer's Name	Sunita Koneru
Filer's email	sun.koneru@gmail.com
Signature	/SK/
Date	07/25/2017
Attachments	Declararion John Johnson.pdf(803908 bytes) Declaration Bobby Lee.pdf(226867 bytes) Declaration Pat Politano.pdf(226239 bytes) Declaration John Dulian.pdf(224318 bytes) Declaration Eddie Ryan.pdf(220835 bytes) Declaration Richard Boyd.pdf(160968 bytes)

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

In the matter of Application Serial No. 86/839,103

Published in the *Official Gazette* (Trademarks) on May 10, 2016

Mark: Design only (stylized human skeleton wearing a motorcycle helmet)

Devil's Disciples MC,)	
)	
Opposer.)	Opposition No. 91228868
)	
v.)	
)	
Fred Woodard,)	
)	
Applicant.)	

DECLARATION OF JOHN WESLEY JOHNSON

I, JOHN WESLEY JOHNSON, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I am the co-founder, a member and current overseer of all chapters of the Devil's Disciples motorcycle club (DDMC).
3. I co-founded the Devil's Disciples motorcycle club (DDMC) with Renegade (deceased) in 1963. I have been a full-time member since founding the DDMC over fifty years ago now. I have been the only person who has been a member of the Devil's Disciples motorcycle club (DDMC) continuously since its founding.
4. An honorary member of the Devil's Disciples motorcycle club (DDMC) is a member in good standing that remains a DDMC club member for life.

5. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket.

6. The Devil's Disciples motorcycle club refers to its membership logo/trademark as its Patch or Colors. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch.

7. In 1964, my co-founder of the Devil's Disciples motorcycle club (DDMC), Renegade, created an oil painting of a human skeleton on a motorcycle bike wearing a helmet. A photo of the 1964 original oil painting painted by my co-founder and dated -64 (1964) in the lower right corner is attached to this declaration as Exhibit A.

8. My co-founder's oil painting was the origin/conception for what became the membership logo/trademark/patch for the Devil's Disciples motorcycle club ("DDMC Skeleton Mark patch"). A photo of our DDMC Skeleton Mark patch is attached to this declaration as Exhibit B.

9. The Devil's Disciples motorcycle club has used its DDMC Skeleton Mark patch continuously since 1964.

10. The DDMC Skeleton Mark patch represents the Devil's Disciples motorcycle club and membership in the motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Disciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Disciples motorcycle club.

11. For over 50 years, the Devil's Disciples motorcycle club has expended time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. Our DDMC Skeleton Mark patch has been a vital asset for the club for over 50 years.

12. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.

13. The DDMC Skeleton Mark patch was conceived in 1964 (inspired by my co-founder's oil painting) well before Applicant Fred Woodard ever joined the Devil's Disciples motorcycle club. Thus, Applicant Fred Woodard does not have prior use of the DDMC Skeleton Mark patch.

14. The Devil's Disciples motorcycle club bylaws were adopted in or around 1966 and are the current and true bylaws of the DDMC. A copy of the club's bylaws is attached to this declaration as Exhibit C.

15. The Devil's Disciples motorcycle club bylaws lay out our club's rules and regulations. Stealing from a Devil's Disciples motorcycle club member is a violation of our club bylaws/rules and is an automatic kick-out from the club. Failing to pay club dues is a violation of our club bylaws/rules and serves reason to kick-out a motorcycle club member.

16. It is an unwritten "rule" of the Devil's Disciples motorcycle club for members to attend the funeral memorial services of other members.

17. The bylaws attached to Applicant's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club.

18. Applicant Fred Woodard is not a current member of the Devil's Disciples motorcycle club and has not been a member of the Devil's Disciples motorcycle club since 1997.

19. Applicant Fred Woodard joined the Devil's Disciples motorcycle club in 1974, 10 years after our club had already adopted and was continuously using its DDMC Skeleton Mark patch.

20. Applicant Fred Woodard was a member of the Devil's Disciples motorcycle club from about 1974-1979.

21. As Applicant Fred Woodard stated in his Answer, he was then convicted and imprisoned for about 16 years. Applicant Fred Woodard was not a member of the Devil's Disciples motorcycle during his incarceration and his DDMC Skeleton Mark patch was revoked.

22. After prison, Applicant Fred Woodard was again a member of the Devil's Disciples motorcycle club for a brief period around 1996/1997 until he was terminated shortly thereafter for trying to rob me.

23. In 1997, Applicant Fred Woodard tried to rob me in my home. Bobby Lee, a Devil's Disciples motorcycle club member, was at my house then when Applicant Fred Woodard tried to rob me.

24. Bobby Lee witnessed when Applicant Fred Woodard tried to rob me at my home in 1997.

25. Trying to rob me was a violation of our club bylaws/rules and was an automatic kick-out from the club. Bobby Lee took Applicant's DDMC Skeleton Mark patch from Applicant Fred Woodard for trying to rob me.

26. Applicant Fred Woodard was automatically terminated from the Devil's Disciples motorcycle club for trying to rob me and his membership was automatically revoked/terminated.

27. Applicant Fred Woodard has not paid club dues to the Devil's Disciples motorcycle club (DDMC) since his termination in 1997. Applicant Fred Woodard has not attended DDMC meetings since his termination in 1997.

28. The Devil's Disciples Motorcycle Club has never designated Applicant Fred Woodard to control the awarding and distribution of its DDMC Skeleton Mark patch. Applicant Fred Woodard has absolutely no rights in or to the DDMC Skeleton Mark patch. Applicant Fred Woodard has absolutely no authorization to award, distribute or revoke the DDMC Skeleton Mark patch.

29. The Devil's Disciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this 21 day of July 2017, in Malden Ma.

John Wesley Johnson
John Wesley Johnson

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF JOHN WESLEY JOHNSON has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru

EXHIBIT A



EXHIBIT B

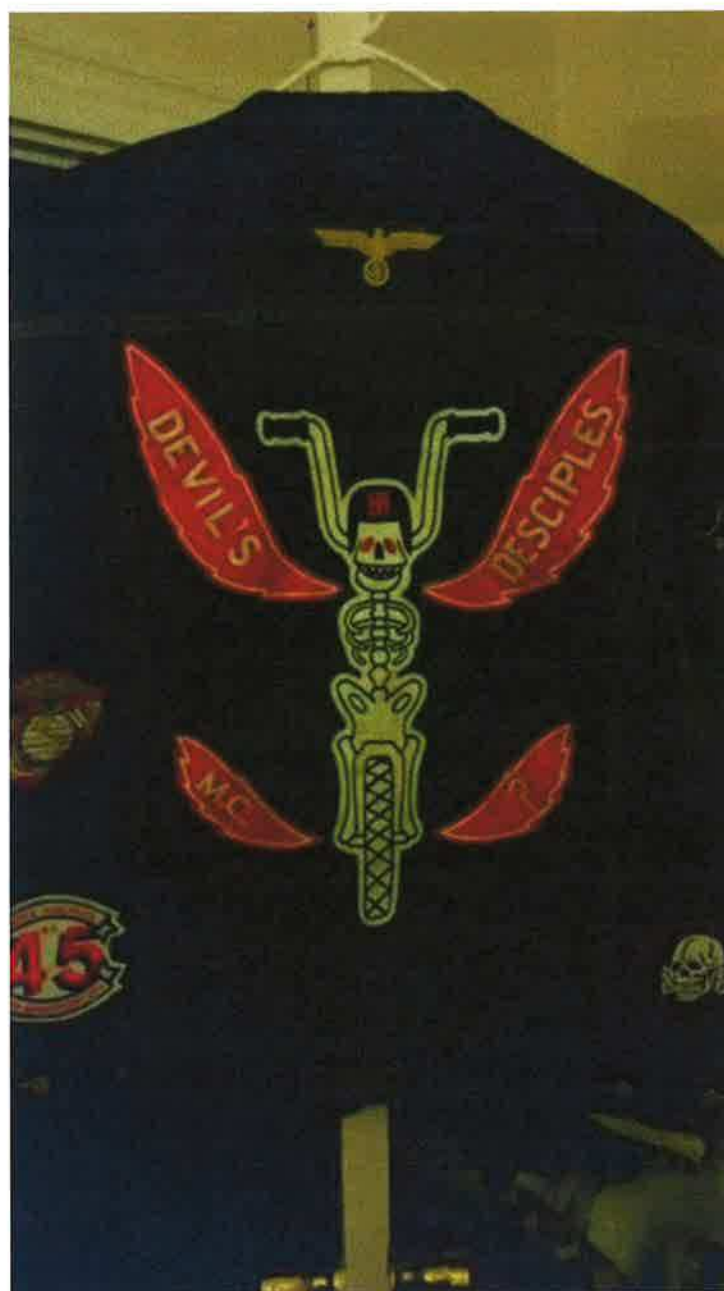


EXHIBIT C

DDMC

1% Bylaws

Devils Desciples Club Constitution.

Devils Desciples M.C. is a motorcycle club and a non-profit organization. President, Vice President, Secretary, and Treasurer are all elected officers, along with two additional elected members, who are not club officers for the Executive Board. All others appointed by the President with a confidence vote from patch-holders in good standing is required.

PRESIDENT

The executive duties of the president are as follows:

1. To preside over meetings of both the Executive Board and the club as a whole.
2. To judge items not covered in the constitution or in the rules regulations.
3. Directorship gives the president authority to judge items not in the constitution.
4. To act as the personal representative of the club in the area of public relations; as a liaison between the DDMC and local-law enforcement agencies; and as a connecting link between the DDMC and other outlaw motorcycle clubs.
5. To represent the club in any club business contacts and to supervise major economic transactions.
6. To assist DDMC officers in the interpretation of their club responsibilities, and to promote club life among members in general.

VICE-PRESIDENT

The executive duties of the vice president are to assume the responsibilities of the presidency when the president is unable to do so.

SECRETARY

The executive duties of the secretary are as follows:

1. To record and safeguard the minutes of the club meetings.
2. To maintain the Club Constitution, recording any additions, deletions, or modifications.
3. To handle any club correspondence.

TREASURER

The executive duties of the treasurer are as follows:

1. To monitor and record the club's income and expenditures.
2. To collect the dues and fines owing by members.

EXECUTIVE BOARD

The executive board consists of those members who were elected as officers of the club along with two additional elected members who are not club officers. The board holds scheduled meetings every two weeks. Emergency meetings can be called if a situation arises that demands immediate attention. The executive board is responsible for:

1. The monitoring of conflicts within the club.
2. The application of disciplinary procedures.
3. The evaluation of prospects and their progress.
4. The presentation of summarized assessments of the overall club situation to the membership (court).

ROAD CAPTAIN

The executive duties of the road captain are as follows:

1. To plan the travel routes and organize the basic itinerary of the club prior to going on a 'run' (tour).
2. To lead the club in formation while riding on tour.

3. To enforce club rules and procedures for group riding.
4. Designate a maintenance supervisor for all club vehicles.

SERGEANT AT ARMS

The executive duties of the sergeant at arms are as follows:

1. To maintain order at club meetings in particular, and club activities in general.
2. To ensure that members adhere to club rulings, policies, and expected models of conduct when dealing with other members or outsiders.
3. To defend club members, property, or territory from outside threats.

COURT

Court will consist of all patch holders that are eligible to vote.

ELECTIONS OF OFFICERS AND EXECUTIVE BOARD NON OFFICER MEMBERS

Officers of the club serve a twelve-month term of office, annual elections are held at the last regular meeting of the year, in December.

1. In order to be eligible for office, a patch holder has to have been an active member in good standing for a minimum of one year.
2. Patch holders who aspire towards a particular position will campaign informally for one month prior to the elections.
3. Electioneering is conducted on an interpersonal face to face basis.
4. Hopeful candidate will approach a member, inform them what he is willing to stand for office if nominated, ask for member's opinion of his qualifications, and solicit the member's support.

Meetings

1. One organized meeting per month.
2. Majority rules.
3. If a vote is taken at a meeting and a member is not there, his vote is void.
4. Only members and probates. Probates get no vote.
5. All meetings will be run on a parliamentary basis. Members will be evicted for unruly conduct.
6. Quorum for a meeting is sixty percent of membership and eighty percent for membership votes.
7. Everyone will attend the meeting on his bike if it is favorable weather, unless his bike is broken down or not running at the time. If the club calls a ride/meeting, all members will attend. If a member is working, sick, bike not running, he will be excused.

However, if a Devils Disciples repeatedly uses work as an excuse for not 'being there,' he will be 'talked to'.

8. Members must have colors with him when attending meetings.
9. Members must be of sound mine (straight) when attending meetings.
10. If a member attends a meeting and is fucked-up, he will be FINED.
11. There will be absolutely no booze or drugs consumed during meetings.
12. During a meeting there will be no talking among members until they get the floor through the president.

A sergeant-at-arms, if not present, will be appointed and anyone not abiding by the above will be evicted.

13. Miss three (3) meetings in a row and you're out of the club.
14. Anyone missing meetings except for work gets fined \$50.00 except for guys in hospital or jail or out of town for a period of time, including prospects.
15. Members must attend meetings to leave club and turn in his colors and everything that has the name Devils Breed on it (T-shirts, wrist bands, mugs, etc.).

16. If a member is thrown out of the club or quits without attending meetings, he loses his colors, motorcycle, and anything else that says Devils Disciples on it, and probably an ass kicking.

Membership qualifications/ Prospects

1. Prospects must be at least 21 years old.
2. Prospects must have a American Bike motorcycle.
3. Prospects cannot do any drugs.
4. Prospects must show a sincere interest in club and bikes.
5. Prospects on the road with bike equipped for the road.

6. Prospect must be sponsored by one member who has known him at least one year (may be waived by vote).
7. Sponsor is responsible for prospect.
8. Sponsor can pull a prospect's rockers at his discretion.
9. Prospects must attend all meetings and club functions.
10. Prospects must do anything another member tells him to do, that a member has done or would be willing to do himself.
11. Prospect will stand behind club and members.
12. No stealing from prospects.
13. Prospect must ride his bike to meeting at time of being voted into club.
14. Prospect must pay that day \$150.00 for his colors before receiving them. \$150.00 is for the patch and \$50.00 is for first month dues. This amount is not refundable.
15. Prospect members must be voted in. Two 'no' votes equal a rejection. One 'no' vote must be explained.
16. Prospective member's prospecting period is at the discretion of sponsor and the club. Directorship shall decide when vote is necessary.
17. Every patch holder in chapter must vote for prospect to make center patch. Vote must be unanimous.
18. No prospect will be voted for center-patch with outstanding loan.
19. Only the sponsor or an officer may hand out a patch to a prospect. This will be done at a meeting with only patch holders present.

RULES AND REGULATIONS

The rules of the club will be strictly enforced. If anyone breaks them, executive board will deal them with. If these rules and regulations are broken, it could mean either immediate dismissal or suspension, whatever the executive board sees fit.

Breaking any of the following Rules will be reason for immediately kick-out from club and probably an Ass Kicking:

1. Failure to pay his dues according to the section dealing with the paying of dues.
2. No hype. No use of heroin in any form. Anyone using a needle for any reason other than having a doctor use it on you will be considered hype. (Automatic kick-out from club)
3. If any brother gets hooked on any drug that is dangerous to the club he will be helped first. Then he will be dealt by the executive board.
4. No narcotics burn. When making deals, persons get what they are promised or the deal is called off (Automatic kick-out from club).
5. If you're selling dope you don't do it as a club member, you don't wear your colors, you don't wear your club T-shirts (Automatic kick-out from club).
6. There will be no stealing among members. Anyone caught will get an ass kicking and be kicked out of the club (Automatic kick-out from club).
7. If a patch holder or prospect throws his colors or quits, colors are pulled (Automatic kick-out from club).
8. Members cannot belong to any other clubs.
9. If a group or individual attacks any member, the whole club shall stand behind him and fight if necessary. If, however, the member is drunk and aggressive and purposely starts an argument, the rest of the members will escort him away, or step between before trouble starts.
10. No member will disgrace the club by being yellow. (The above rules will be put forward to applicants. If they cannot abide by these rules and are not in favor of them, they will be denied membership to the club.)
11. No member will destroy club property purposely.
12. No member will take the attitude that he doesn't have to help other members and other members don't have to help him
13. No member will go against anything the club has voted for and passed.
14. No member will get together on their own and plan something for themselves on club rides. It will be brought up to the whole club and the whole club will participate in anything that is decided upon.

15. The club will always stay together on rides, runs, parties, field meets etc. and will not fraternize with club's rival clubs. The only way a member will be permitted to leave the main group will be to notify the president or whoever is in charge. When the time comes that the majority feels it is time to leave, we will all leave together. Anyone staying behind for a good reason will do so at his own risk and can expect no help.

16. Members will have good attendance. Members must have a good reason for not attending meetings or rides, such as working, sickness, no transportation, and bike not running.

If anyone breaks general rules, executive board will deal with them and/or voted by the court.

1. No explosives of any kind will be thrown into the fire where there is one or more Devils Desciples in the area. FINE: Ass whipping and subject to the executive board.

2. Brother shall not fight each other with weapons; when any Devils Desciples fights another Devils Breed, it is one on one, prospects same as members. FINE: \$100.00 for breaking above rule or possible loss of patch.

3. If you don't help out the Club in its activities and you use the Club solely for your benefit, you will be warned. No second chance.

4. Do as you say or walk the line.

5. Devils Desciples losing privilege of wearing colors will also lose privilege of voting and ruling over prospects.

6. The treasurer shall keep a clear record of all money paid in and out during the week and will balance it before every meeting; the books will be gone over once a week.

7. All Devils Desciples fines will be paid within 30 days. Fines will be paid to the treasurer.

8. Members with extra parts will loan them to members. They must be replaced or paid for.

9. If you get busted and or go to jail, notify an officer or member so he can arrange for your bail.

10. Where we go on our rides will be voted upon by the entire membership.

11. Everyone must have an American bike. Consideration will be give to any member who is in between bikes but he must sincerely intend to get another bike in the near future.

12. If a member's bike is not running for a period of thirty days, unless he is in jail or hospital, his colors will be confiscated. A member's bike must be running for the season. No Exceptions. This is a
MOTORCYCLE CLUB!

13. Confirmation vote is required for all new patch-holders at their 8 week point. Unanimous vote from all good standing members is required.

14. Absolutely no talking about Club business to persons outside the Club. No talking about Club business over any telephone.

15. If you are told you are too drunk to ride, you will turn over your keys to a brother. You and your scooter will be taken care of.

16. If the Road Captain or an Officer determines your bike is unsafe to ride, you are grounded until it is safe.

17. During funeral runs, no one will pack a passenger, patch must be seen.

18. All Club vehicles will be returned with all fluids full and in good condition. Maintenance will be done under the supervision of the maintenance supervisor; a patch holder designated by the Road Captain.

19. There shall be a wrecking crew consisting of the Sergeant at Arms, the Junior Patch, and whomever the Senior Patch may designate. The purpose of the wrecking crew is to check out bars, etc. prior to entry by President, Vice President, or Senior Patch.

20. Prospect will watch all bikes when members are at Club functions, in bars, and anywhere the senior member present deems necessary.

21. There will be a Club run on a Sunday once a month. Whoever picks the run route will lead the pack.
DUES/LOANS

1. Club dues will be paid each month, due by the first.

2. Two months overdue is the limit.

3. They are \$50.00 per month.

4. Dues will be \$50.00 per month payable 1st meeting of the month.

5. If within two months dues still aren't paid, the colors will be forfeited to pay them and member will no longer be considered a member. The only exception to this shall be if a member is in jail or if he is out of town for a period of time. If he is in jail, dues won't be expected, but if he is out of town dues will be paid when he returns.

6. All loans or debts will be secured by collateral. Members will agree upon payment. Two patch holders must be present in any personal loan transaction.

Respect

1. Respect is to be shown to all club members, officers, members, members', bikes, OL', ladies, house, job, etc. In other words, if it's not yours, 'Don't Mess with it.

2. Respect your colors.

3. No stealing from members.

4. No fighting among each other is allowed, any punches to be thrown will be done by the Sgt At Arms.

Colors

1. President gets colors from mother club in area when new member is voted in.

2. When a member leaves club, member turns over colors to president of chapter.

3. Respect your colors; don't let anyone take them from you except the president of the chapter.

4. No colors are worn in a cage, except during funerals and loading or unloading a bike from a truck.

5. No hippie shit on the front.

6. Nothing will be worn on the back of your jacket except colors.

7. Colors must be worn at all times when riding or at Club functions. Only one of your brothers or your OL' lady can babysit your colors. Colors are not required to be worn to and from employment if not allowed by employer. If patch is lost or stolen, patch holder will be judged by court.

8. The only way a member of Devils Desciples can retire and keep his patch is if local officers authorize him. Minimum time for retirement is 5 years.

OL' ladies

1. Don't fuck around with brother's OL' lady. (Probably an Ass Kicking and kick-out from club).

2. Property patches will be brought up before all patch holders for input. Majority vote from all eligible patch holders is required.

3. Members are responsible for their OL' ladies.

4. Members may have more than one (1) OL' lady.

5. Members must state who his OL' lady is.

6. Members may not discuss club business with their OL' lady.

7. No OL' ladies allowed at meetings.

8. OL' ladies are allowed unescorted at clubhouse only by prior arrangement by OL' man.

9. Property patch is worn optional on an OL' lady. So if you see a chick you better ask before you leap.

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Published in the *Official Gazette* (Trademarks) on May 10, 2016

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Opposer.)	Opposition No. 91228868
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v.)	
)	
Fred Woodard,)	
)	
Applicant.)	

DECLARATION OF BOBBY LEE

I, BOBBY LEE, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I joined the Devil's Disciples motorcycle club (DDMC) as a member in 1964 and have remained a member since joining the DDMC over fifty years ago now.
3. I co-founded the Devil's Disciples motorcycle club (DDMC) with Renegade (deceased) in 1963. I have been a full-time member since founding the DDMC over fifty years ago now.
4. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch.

5. In 1964, the co-founder of the Devil's Desciples motorcycle club (DDMC), Renegade, created an oil painting of a human skeleton on a motorcycle bike wearing a helmet; this oil painting was the origin/conception for what became the membership logo/trademark/patch for the Devil's Desciples motorcycle club (DDMC Skeleton Mark patch). A photo of the 1964 original oil painting painted by the co-founder and dated -64 (1964) in the lower right corner is attached to the declaration of John Wesley Johnson.

6. The Devil's Desciples motorcycle club has used its DDMC Skeleton Mark patch continuously since 1964. The DDMC Skeleton Mark patch has been synonymous with membership in the Devil's Desciples motorcycle club for the past 50 years. The Devil's Desciples motorcycle club refers to its membership logo/trademark as its Patch or Colors.

7. The DDMC Skeleton Mark patch represents the Devil's Desciples motorcycle club and membership in the motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Desciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Desciples motorcycle club.

8. For over 50 years, the Devil's Desciples motorcycle club has expended time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. Our DDMC Skeleton Mark patch has been a vital asset for the club for over 50 years.

9. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.

10. The DDMC Skeleton Mark patch was conceived in 1964 (inspired by the co-founder's oil painting) well before Applicant Fred Woodard ever joined the Devil's Desciples motorcycle

club. Thus, Applicant Fred Woodard does not have prior use of the DDMC Skeleton Mark patch.

11. The Devil's Disciples motorcycle club has bylaws which state the club's rules and regulations. The bylaws attached to the declaration of John Wesley Johnson are the current and true bylaws of the Devil's Disciples motorcycle club (DDMC).

12. The Devil's Disciples motorcycle club bylaws state that stealing from a DDMC member is a violation of DDMC bylaws/rules and serves as an automatic kick-out from the club.

13. The bylaws attached to Applicant Fred Woodard's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club (DDMC).

14. An unwritten "rule" of the Devil's Disciples motorcycle club (DDMC) is for members to attend the funeral memorial services of other members.

15. Applicant Fred Woodard is not a member of the Devil's Disciples motorcycle club. Applicant Fred Woodard was terminated from the Devil's Disciples motorcycle club (DDMC) in 1997.

16. Applicant Fred Woodard joined the Devil's Disciples motorcycle club in 1974, 10 years after our club (DDMC) had already adopted and was continuously using our DDMC Skeleton Mark patch.

17. Applicant Fred Woodard was a member from about 1974-1979.

18. As Applicant Fred Woodard stated in his Answer, he was then convicted and imprisoned for about 16 years. Applicant Fred Woodard was not a member of the Devil's Disciples motorcycle during his incarceration and his DDMC Skeleton Mark patch was revoked.

19. After prison, Applicant Fred Woodard was again a member of the Devil's Disciples motorcycle club for a brief period around 1996/1997 until he was terminated shortly thereafter for trying to rob our co-founder and member John Wesley Johnson.
20. In 1997, I was present at John Wesley Johnson's house when Applicant Fred Woodard arrived. Applicant Fred Woodard tried to rob Mr. Johnson at Mr. Johnson's home.
21. Stealing from a Devil's Disciples motorcycle club member is a violation of DDMC bylaws/rules and is an automatic kick-out from the club.
22. After he tried to rob Mr. Johnson, I took Applicant Fred Woodard's DDMC Skeleton Mark patch from Applicant Fred Woodard for trying to rob Mr. Johnson. By trying to rob Mr. Johnson, Applicant Fred Woodard's was automatically terminated from the Devil's Disciples motorcycle club and his membership was automatically revoked.
23. Applicant Fred Woodard has not attended the Devil's Disciples motorcycle club meetings since his termination in 1997.
24. Of the funeral/memorial services I have attended for Devil's Disciples motorcycle club members, Applicant Fred Woodard has not been in attendance.
25. Our club has used its DDMC Skeleton Mark patch continuously for the past 50 years since our co-founder conceived it. Our DDMC Skeleton Mark patch predates any alleged claimed mark of Applicant Fred Woodard.
26. The Devil's Disciples motorcycle club has never designated control or distribution of its DDMC Skeleton Mark patch to Applicant Fred Woodard. The Devil's Disciples motorcycle club has never given Applicant Fred Woodard any control to award or distribute its DDMC Skeleton Mark patch.

27. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard. Applicant Fred Woodard has no ownership rights in or to the DDMC Skeleton Mark patch.

28. Applicant Fred Woodard has absolutely no right to award or distribute our DDMC Skeleton Mark patch.

29. The Devil's Disciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this 19 day of July 2017, in State of Maine.

Bobby Lee

Bobby Lee

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF BOBBY LEE has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru

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v.)	
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Fred Woodard,)	
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Applicant.)	

DECLARATION OF PAT POLITANO

I, PAT POLITANO, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I joined the Devil's Disciples motorcycle club (DDMC) in 1964 and remain an honorary member. An honorary member of the Devil's Disciples motorcycle club (DDMC) is a member in good standing that remains a DDMC club member for life.
3. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch.

4. In 1964, the co-founder of the Devil's Desciples motorcycle club (DDMC), Renegade, created an oil painting of a human skeleton on a motorcycle bike wearing a helmet; this oil painting was the origin/conception for what became the membership logo/trademark/patch for the Devil's Desciples motorcycle club (DDMC Skeleton Mark patch). The photo attached to the declaration of John Wesley Johnson is a photo of the 1964 original oil painting painted by our co-founder and is dated -64 (1964) in the lower right corner.

5. The Devil's Desciples motorcycle club has used its DDMC Skeleton Mark membership logo/trademark/patch continuously since 1964. The DDMC Skeleton Mark patch has been synonymous with membership in the Devil's Desciples motorcycle club for the past 50 years. The Devil's Desciples motorcycle club refers to its membership logo/trademark as its Patch or Colors.

6. The DDMC Skeleton Mark patch represents to the Devil's Desciples motorcycle club and membership in the motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Desciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Desciples motorcycle club.

7. For over 50 years, the Devil's Desciples motorcycle club has expended time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. Our DDMC Skeleton Mark patch has been a vital asset for the club for over 50 years.

8. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.

9. The DDMC Skeleton Mark patch was conceived in 1964 (inspired by our co-founder's oil painting) well before Applicant Fred Woodard ever joined the Devil's Desciples motorcycle

club. Thus, Applicant Fred Woodard does not have prior use of the DDMC Skeleton Mark patch.

10. The Devil's Disciples motorcycle club has bylaws which state the club's rules and regulations. The bylaws attached to the declaration of John Wesley Johnson are the current and true bylaws of the Devil's Disciples motorcycle club (DDMC).

11. The Devil's Disciples motorcycle club bylaws state that stealing from a DDMC member is a violation of DDMC bylaws/rules and serves as an automatic kick-out from the club.

12. The bylaws attached to Applicant Fred Woodard's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club (DDMC).

13. An unwritten "rule" of the Devil's Disciples motorcycle club (DDMC) is for members to attend the funeral memorial services of other members.

14. Applicant Fred Woodard is not a member of the Devil's Disciples motorcycle club. Applicant Fred Woodard was terminated from the Devil's Disciples motorcycle club (DDMC) in 1997.

15. Applicant Fred Woodard joined the Devil's Disciples motorcycle club in 1974, 10 years after our club (DDMC) had already adopted and was continuously using our DDMC Skeleton Mark patch.

16. Applicant Fred Woodard was a member from about 1974-1979.

17. As Applicant Fred Woodard stated in his Answer, he was then convicted and imprisoned for about 16 years. Applicant Fred Woodard was not a member of the Devil's Disciples motorcycle during his incarceration and his DDMC Skeleton Mark patch was revoked.

18. After prison, Applicant Fred Woodard was again a member of the Devil's Disciples motorcycle club for a brief period around 1996/1997 until he was terminated shortly thereafter for trying to rob our co-founder and member John Wesley Johnson at Mr. Johnson's home.

19. I was a member of the Devil's Disciples motorcycle club (DDMC) when Applicant Fred Woodard tried to rob our co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard was terminated from the club for trying to rob co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard's DDMC membership was permanently revoked for trying to rob co-founder and member John Wesley Johnson.

20. Stealing from a Devil's Disciples motorcycle club member is a violation of DDMC bylaws/rules and is an automatic kick-out from the club.

21. To my knowledge, Applicant Fred Woodard has not attended the Devil's Disciples motorcycle club meetings since his termination in 1997.

22. Of the funeral/memorial services I have attended for Devil's Disciples motorcycle club members, Applicant Fred Woodard has not been in attendance.

23. Our club has used its DDMC Skeleton Mark patch continuously for the past 50 years since our co-founder conceived it. Our DDMC Skeleton Mark patch predates any alleged claimed mark of Applicant Fred Woodard.

24. The Devil's Disciples motorcycle club has never designated control or distribution of its DDMC Skeleton Mark patch to Applicant Fred Woodard. The Devil's Disciples motorcycle club has never given Applicant Fred Woodard any control to award or distribute its DDMC Skeleton Mark patch.

25. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard. Applicant Fred Woodard has no ownership rights in or to the DDMC Skeleton Mark patch.

26. Applicant Fred Woodard has absolutely no right to award or distribute our DDMC Skeleton Mark patch.

27. The Devil's Disciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this 20 day of July 2017, in Revere mass.


Pat Politano

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF PAT POLITANO has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru

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

In the matter of Application Serial No. 86/839,103

Published in the *Official Gazette* (Trademarks) on May 10, 2016

Mark: Design only (stylized human skeleton wearing a motorcycle helmet)

Devil's Disciples MC,)	
)	
Opposer.)	Opposition No. 91228868
)	
v.)	
)	
Fred Woodard,)	
)	
Applicant.)	

DECLARATION OF JOHN DULIAN

I, JOHN DULIAN, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I joined the Devil's Disciples motorcycle club (DDMC) in 1964 and remain an honorary member. An honorary member of the Devil's Disciples motorcycle club (DDMC) is a member in good standing that remains a DDMC club member for life.
3. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch.

4. In 1964, the co-founder of the Devil's Disciples motorcycle club (DDMC), Renegade, created an oil painting of a human skeleton on a motorcycle bike wearing a helmet; this oil painting was the origin/conception for what became the membership logo/trademark/patch for the Devil's Disciples motorcycle club (DDMC Skeleton Mark patch). The photo attached to the declaration of John Wesley Johnson is a photo of the 1964 original oil painting painted by our co-founder and is dated -64 (1964) in the lower right corner.

5. The Devil's Disciples motorcycle club has used its DDMC Skeleton Mark membership logo/trademark/patch continuously since 1964. The DDMC Skeleton Mark patch has been synonymous with membership in the Devil's Disciples motorcycle club for the past 50 years. The Devil's Disciples motorcycle club refers to its membership logo/trademark as its Patch or Colors.

6. The DDMC Skeleton Mark patch represents to the Devil's Disciples motorcycle club and membership in the motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Disciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Disciples motorcycle club.

7. For over 50 years, the Devil's Disciples motorcycle club has expended time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. Our DDMC Skeleton Mark patch has been a vital asset for the club for over 50 years.

8. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.

9. The DDMC Skeleton Mark patch was conceived in 1964 (inspired by our co-founder's oil painting) well before Applicant Fred Woodard ever joined the Devil's Disciples motorcycle

club. Thus, Applicant Fred Woodard does not have prior use of the DDMC Skeleton Mark patch.

10. The Devil's Disciples motorcycle club has bylaws which state the club's rules and regulations. The bylaws attached to the declaration of John Wesley Johnson are the current and true bylaws of the Devil's Disciples motorcycle club (DDMC).

11. The Devil's Disciples motorcycle club bylaws state that stealing from a DDMC member is a violation of DDMC bylaws/rules and serves as an automatic kick-out from the club.

12. The bylaws attached to Applicant Fred Woodard's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club (DDMC).

13. An unwritten "rule" of the Devil's Disciples motorcycle club (DDMC) is for members to attend the funeral memorial services of other members.

14. Applicant Fred Woodard is not a member of the Devil's Disciples motorcycle club. Applicant Fred Woodard was terminated from the Devil's Disciples motorcycle club (DDMC) in 1997.

15. Applicant Fred Woodard joined the Devil's Disciples motorcycle club in 1974, 10 years after our club (DDMC) had already adopted and was continuously using our DDMC Skeleton Mark patch.

16. Applicant Fred Woodard was a member from about 1974-1979.

17. As Applicant Fred Woodard stated in his Answer, he was then convicted and imprisoned for about 16 years. Applicant Fred Woodard was not a member of the Devil's Disciples motorcycle during his incarceration and his DDMC Skeleton Mark patch was revoked.

18. After prison, Applicant Fred Woodard was again a member of the Devil's Disciples motorcycle club for a brief period around 1996/1997 until he was terminated shortly thereafter for trying to rob our co-founder and member John Wesley Johnson at Mr. Johnson's home.

19. I was a member of the Devil's Disciples motorcycle club (DDMC) when Applicant Fred Woodard tried to rob our co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard was terminated from the club for trying to rob co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard's DDMC membership was permanently revoked for trying to rob co-founder and member John Wesley Johnson.

20. Stealing from a Devil's Disciples motorcycle club member is a violation of DDMC bylaws/rules and is an automatic kick-out from the club.

21. To my knowledge, Applicant Fred Woodard has not attended the Devil's Disciples motorcycle club meetings since his termination in 1997.

22. Of the funeral/memorial services I have attended for Devil's Disciples motorcycle club members, Applicant Fred Woodard has not been in attendance.

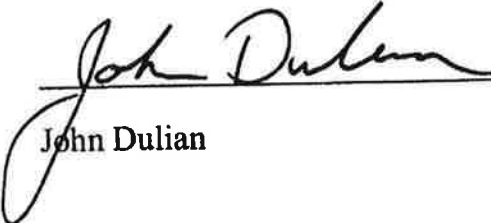
23. Our club has used its DDMC Skeleton Mark patch continuously for the past 50 years since our co-founder conceived it. Our DDMC Skeleton Mark patch predates any alleged claimed mark of Applicant Fred Woodard.

24. The Devil's Disciples motorcycle club has never designated control or distribution of its DDMC Skeleton Mark patch to Applicant Fred Woodard. The Devil's Disciples motorcycle club has never given Applicant Fred Woodard any control to award or distribute its DDMC Skeleton Mark patch.

25. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard. Applicant Fred Woodard has no ownership rights in or to the DDMC Skeleton Mark patch.
26. Applicant Fred Woodard has absolutely no right to award or distribute our DDMC Skeleton Mark patch.
27. The Devil's Disciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this July 22 day of 22 2017, in Revere.


John Dulian

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF JOHN DULIAN has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru

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

In the matter of Application Serial No. 86/839,103

Published in the *Official Gazette* (Trademarks) on May 10, 2016

Mark: Design only (stylized human skeleton wearing a motorcycle helmet)

Devil's Disciples MC,)	
)	
)	Opposition No. 91228868
Opposer.)	
)	
v.)	
)	
Fred Woodard,)	
)	
Applicant.)	

DECLARATION OF EDDIE RYAN

I, EDDIE RYAN, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I joined the Devil's Disciples motorcycle club (DDMC) in 1964 and remain an honorary member. An honorary member of the Devil's Disciples motorcycle club (DDMC) is a member in good standing that remains a DDMC club member for life.
3. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch.

4. In 1964, the co-founder of the Devil's Desciples motorcycle club (DDMC), Renegade, created an oil painting of a human skeleton on a motorcycle bike wearing a helmet; this oil painting was the origin/conception for what became the membership logo/trademark/patch for the Devil's Desciples motorcycle club (DDMC Skeleton Mark patch). The photo attached to the declaration of John Wesley Johnson is a photo of the 1964 original oil painting painted by our co-founder and is dated -64 (1964) in the lower right corner.

5. The Devil's Desciples motorcycle club has used its DDMC Skeleton Mark membership logo/trademark/patch continuously since 1964. The DDMC Skeleton Mark patch has been synonymous with membership in the Devil's Desciples motorcycle club for the past 50 years. The Devil's Desciples motorcycle club refers to its membership logo/trademark as its Patch or Colors.

6. The DDMC Skeleton Mark patch represents to the Devil's Desciples motorcycle club and membership in the motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Desciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Desciples motorcycle club.

7. For over 50 years, the Devil's Desciples motorcycle club has expended time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. Our DDMC Skeleton Mark patch has been a vital asset for the club for over 50 years.

8. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.

9. The DDMC Skeleton Mark patch was conceived in 1964 (inspired by our co-founder's oil painting) well before Applicant Fred Woodard ever joined the Devil's Desciples motorcycle

club. Thus, Applicant Fred Woodard does not have prior use of the DDMC Skeleton Mark patch.

10. The Devil's Disciples motorcycle club has bylaws which state the club's rules and regulations. The bylaws attached to the declaration of John Wesley Johnson are the current and true bylaws of the Devil's Disciples motorcycle club (DDMC).

11. The Devil's Disciples motorcycle club bylaws state that stealing from a DDMC member is a violation of DDMC bylaws/rules and serves as an automatic kick-out from the club.

12. The bylaws attached to Applicant Fred Woodard's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club (DDMC).

13. An unwritten "rule" of the Devil's Disciples motorcycle club (DDMC) is for members to attend the funeral memorial services of other members.

14. Applicant Fred Woodard is not a member of the Devil's Disciples motorcycle club. Applicant Fred Woodard was terminated from the Devil's Disciples motorcycle club (DDMC) in 1997.

15. Applicant Fred Woodard joined the Devil's Disciples motorcycle club in 1974, 10 years after our club (DDMC) had already adopted and was continuously using our DDMC Skeleton Mark patch.

16. Applicant Fred Woodard was a member from about 1974-1979.

17. As Applicant Fred Woodard stated in his Answer, he was then convicted and imprisoned for about 16 years. Applicant Fred Woodard was not a member of the Devil's Disciples motorcycle during his incarceration and his DDMC Skeleton Mark patch was revoked.

18. After prison, Applicant Fred Woodard was again a member of the Devil's Disciples motorcycle club for a brief period around 1996/1997 until he was terminated shortly thereafter for trying to rob our co-founder and member John Wesley Johnson at Mr. Johnson's home.

19. I was a member of the Devil's Disciples motorcycle club (DDMC) when Applicant Fred Woodard tried to rob our co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard was terminated from the club for trying to rob co-founder and member John Wesley Johnson. I was a member of the Devil's Disciples motorcycle club when Applicant Fred Woodard's DDMC membership was permanently revoked for trying to rob co-founder and member John Wesley Johnson.

20. Stealing from a Devil's Disciples motorcycle club member is a violation of DDMC bylaws/rules and is an automatic kick-out from the club.

21. To my knowledge, Applicant Fred Woodard has not attended the Devil's Disciples motorcycle club meetings since his termination in 1997.

22. Of the funeral/memorial services I have attended for Devil's Disciples motorcycle club members, Applicant Fred Woodard has not been in attendance.

23. Our club has used its DDMC Skeleton Mark patch continuously for the past 50 years since our co-founder conceived it. Our DDMC Skeleton Mark patch predates any alleged claimed mark of Applicant Fred Woodard.

24. The Devil's Disciples motorcycle club has never designated control or distribution of its DDMC Skeleton Mark patch to Applicant Fred Woodard. The Devil's Disciples motorcycle club has never given Applicant Fred Woodard any control to award or distribute its DDMC Skeleton Mark patch.

25. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard. Applicant Fred Woodard has no ownership rights in or to the DDMC Skeleton Mark patch.
26. Applicant Fred Woodard has absolutely no right to award or distribute our DDMC Skeleton Mark patch.
27. The Devil's Desciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this 20th day of JULY 2017, in Waltham Ma.


Eddie Ryan

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF EDDIE RYAN has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru

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

In the matter of Application Serial No. 86/839,103

Published in the *Official Gazette* (Trademarks) on May 10, 2016

Mark: Design only (stylized human skeleton wearing a motorcycle helmet)

Devil's Disciples MC,)	
)	
)	Opposition No. 91228868
Opposer.)	
)	
v.)	
)	
Fred Woodard,)	
)	
Applicant.)	

DECLARATION OF RICHARD BOYD

I, RICHARD BOYD, do hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated.
2. I joined the Devil's Disciples motorcycle club (DDMC) as a member in 2012 and I am currently the Devil's Disciples motorcycle club's regional president and treasurer.
3. A "patch" is a motorcycle club's logo/trademark and is the key/vital/chief item/article to indicate membership in a motorcycle club. A club's patch is typically worn on a member's jacket. When a member leaves the Devil's Disciples motorcycle club, goes to prison or is terminated from the club he must turn over his patch. The Devil's Disciples motorcycle club refers to its membership logo/trademark as its Patch or Colors

4. The Devil's Disciples motorcycle club's original "patch" is a human skeleton on a motorcycle bike wearing a helmet; this "patch" is the Devil's Disciples motorcycle club's membership logo/trademark (DDMC Skeleton Mark patch).
5. The DDMC Skeleton Mark patch is synonymous with membership in the Devil's Disciples motorcycle club.
6. The DDMC Skeleton Mark patch represents membership in the Devil's Disciples motorcycle club. Our DDMC Skeleton Mark patch is not personal to any one member but signifies the persona/style of the Devil's Disciples motorcycle club. Our DDMC Skeleton Mark patch is not owned by any individual member but by the Devil's Disciples motorcycle club.
7. The Devil's Disciples motorcycle club expends time and money to safeguard the goodwill of its DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch is our club's vital asset.
8. Applicant Fred Woodard does not control our DDMC Skeleton Mark patch. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard.
9. The Devil's Disciples motorcycle club has bylaws which state the club's rules and regulations. The bylaws attached to the declaration of John Wesley Johnson are the current and true bylaws of the Devil's Disciples motorcycle club (DDMC).
10. The Devil's Disciples motorcycle club bylaws state that stealing from a DDMC member is a violation of DDMC bylaws/rules and serves as an automatic kick-out from the club.
11. The bylaws attached to Applicant Fred Woodard's Response to DDMC's Requests for Documents are not the bylaws of the Devil's Disciples motorcycle club (DDMC).
12. An unwritten "rule" of the Devil's Disciples motorcycle club (DDMC) is for members to attend the funeral memorial services of other members.

13. Stealing from a Devil's Disciples motorcycle club member is a violation of DDMC bylaws/rules and is an automatic kick-out from the club.
14. Applicant Fred Woodard is not a member of the Devil's Disciples motorcycle club.
15. To my knowledge, Applicant Fred Woodard has not attended the Devil's Disciples motorcycle club meetings while I have been a member.
16. Of the funeral/memorial services I have attended for Devil's Disciples motorcycle club members, Applicant Fred Woodard has not been in attendance.
17. The Devil's Disciples motorcycle club has never designated control or distribution of its DDMC Skeleton Mark patch to Applicant Fred Woodard. The Devil's Disciples motorcycle club has never given Applicant Fred Woodard any control to award or distribute its DDMC Skeleton Mark patch.
18. The DDMC Skeleton Mark patch does not inure to Applicant Fred Woodard. Applicant Fred Woodard has no ownership rights in or to the DDMC Skeleton Mark patch.
19. Applicant Fred Woodard has absolutely no right to award or distribute our DDMC Skeleton Mark patch.
20. The Devil's Disciples Motorcycle Club would never grant rights or give control of its DDMC Skeleton Mark patch to someone who tried to rob a DDMC member.

The signatory being warned that willful false statement and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his own knowledge are true and all statements made on information and belief are believed to be true.

Executed this 20 day of July 2017, in Revere MASS.

A handwritten signature in cursive script, appearing to read "Richard Boyd", written over a horizontal line.

Richard Boyd

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I hereby certify that a true and complete copy of the foregoing DECLARATION OF RICHARD BOYD has been served electronically on Applicant through Applicant 's counsel, by emailing said copy on July 26, 2017 via electronic transmission (as agreed to by counsel for Opposer and Applicant) to Applicant 's counsel as follows:

Matthew Saunders
msaunders@massiplaw.com
Saunders & Silverstein LLP Greenberg Traurig, LLP
14 Cedar Street, Suite 224
Amesbury, MA 01913

Date: July 26, 2017

By: /s/Sunita Koneru