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

Proceeding	91192387
Party	Plaintiff Harry Winston, Inc., Harry Winston S.A.
Correspondence Address	Joseph R. Dreitler Bricker & Eckler, LLP 100 South Third Street Columbus, OH 43215 UNITED STATES trademarks@bricker.com
Submission	Motion for Default Judgment
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Date	03/08/2010
Attachments	Microsoft Word - HWI v Hairy Winston Motion for Default Judgment_DOC.pdf (3 pages)(11741 bytes)

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

IN THE MATTER OF: TRADEMARK APPLICATION NO. 77/684,863 –
HAIRY WINSTON LUXURY PET BOUTIQUE

DATE OF PUBLICATION: June 30, 2009

HARRY WINSTON, INC. and	:	
HARRY WINSTON S.A.	:	
	:	
Opposers,	:	Opposition No. 91192387
	:	
v.	:	
	:	
HAIRY WINSTON, LLC	:	
	:	
Applicant.	:	

OPPOSER’S MOTION FOR DEFAULT JUDGMENT

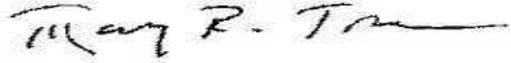
Pursuant to Rule 2.114(a) of the Trademark Rules of Practice, TBMP §§ 312 and 508, and Rule 55(b)(2) of the Federal Rules of Civil Procedure, Opposers respectfully request the Board to enter judgment by default against Applicant.

On October 22, 2009, Opposer filed its Notice of Opposition to Applicant’s application Serial No. 77/684,863. By stipulation of the parties, Applicant’s Answer was due January 15, 2010. To date, Applicant has not filed an answer and is in default. On February 2, 2010, the Board entered a Notice of Default against Applicant, and allowed Applicant thirty days to show cause within thirty days why default judgment should not be entered against it. Applicant has not responded. Accordingly, Opposers respectfully request that default judgment be entered against Applicant in accordance with Rule 55(b) of the Federal Rules of Civil Procedure.

Dated: March 8, 2010

Respectfully submitted,

BRICKER & ECKLER, LLP



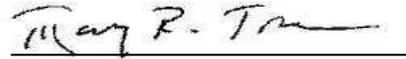
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*Attorneys for Opposers
Harry Winston, Inc. and Harry Winston S.A.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Opposer's Motion for Default Judgment* was served this 8th day of March, 2010, via email at john@harlestonlawfirm.com and via first class mail, postage prepaid on:

John Harleston, Esq.
The Harleston Law Firm, LLC
909 Tall Pine Road
Mt. Pleasant, SC 29464-2909

A handwritten signature in black ink, appearing to read "Mary R. True", written over a horizontal line.

Mary R. True