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Filing date: **06/25/2014**

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

Proceeding	91200183
Party	Defendant Miss G-String International LLC
Correspondence Address	LUKE LIROT LUKE CHARLES LIROT PA 2240 BELLEAIR ROAD, SUITE 190 CLEARWATER, FL 33764 UNITED STATES luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Submission	Motion for Default Judgment
Filer's Name	Luke Lirot
Filer's e-mail	luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Signature	/s/Luke Lirot
Date	06/25/2014
Attachments	Motion for Default Judgment for Failure to Answer - as filed - 6-25-14.pdf(60111 bytes )

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

THE WORLDS PAGEANTS, LLC and Camila Productions, Ltd.	)	Opposition No. 91,200,183
	)	
Opposers,	)	
	)	
	)	
	)	For: "MISS G-STRING INTERNATIONAL"
v.	)	
	)	
	)	
MISS G-STRING INTERNATIONAL LLC,	)	No. 77/753,000
Applicant.	)	Published: December 7, 2010

COMMISSIONER OF TRADEMARKS  
UNITED STATES PATENT AND TRADEMARK OFFICE  
Trademark Trial and Appeal Board  
P.O. Box 1451

**MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER**

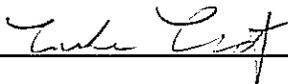
Pursuant to Rule 55 of the Federal Rules of Civil Procedure, Applicant, Miss G-String International LLC ("Applicant") hereby files this Motion for Default Judgment for Failure to Answer, and moves for default judgment on the Oppositions filed by Opposers, The Worlds Pageants, LLC, and Camila Productions, Ltd. (collectively, the "Opposers") for failure to answer. The Applicant's First Amended Motion for Summary Judgment was filed and served on May 20, 2014. Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Opposer must serve an answer within 21 days after being served, and pursuant to Rule 6(d) of the Federal Rules of Civil Procedure, 3 more days are added after the period would otherwise expire. Even with generous times allowed for mailing (in this age of electronic filing) the deadline for filing a responsive pleading or answer to the Applicant's First Amended Motion for Summary Judgment was June 12, 2014. As it has been 36 days since the Applicant filed and served the First

Amended Motion for Summary Judgment, the Applicant's motion for default judgment is timely filed pursuant to 37 C.F.R. § 2.127(e)(1).

The notice states that neither an answer nor any extension of time to answer has been filed and that notice of default under Fed. R. Civ. P. 55(a) is entered. Applicant may file a motion for default judgment, in which case the motion may serve as a substitute for the Trademark Trial and Appeal Board (the "Board") issuance of a notice of default and allows 20 days from the mailing date of the notice in which to show cause why default judgment should not be entered against it.

Applicant respectfully seeks an order from the Board entering judgment against Opposer, dismissing the notice of Opposition dated June 6, 2011, (the "Notice of Opposition") and approving Applicant's marks filed under Serial No. 77/753,000 ("Applicant's Application") for registration.

Respectfully Submitted:

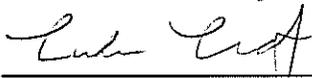
By  Dated June 25, 2014

Luke Lirot, Esquire  
Florida Bar Number 714836  
LUKE CHARLES LIROT, P.A.  
2240 Belleair Road, Suite 190  
Clearwater, Florida 33764  
Telephone: (727) 536-2100  
Facsimile: (727) 536-2110  
*Attorney for the Applicant*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Applicant's Motion for Default Judgment for Failure to Answer has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC and Camila Productions, Ltd. by mailing said copy on June 25, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.  
221 Coe Hill Road  
Center Harbor, New Hampshire 03226.



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Luke Lirot, Esq., Attorney for Applicant  
Signed June 25, 2014