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

Proceeding	91210360
Party	Plaintiff Cequent Performance Products, Inc.
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Submission	Motion for Default Judgment
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Signature	/William A. McKenna, Reg. No. 64,488/
Date	09/06/2013
Attachments	Motion for Default Judgment.pdf(107154 bytes)

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

In the matter of trademark application Serial No. 77/938,369
For the mark DRAW-TITE
Published in the Official Gazette on December 25, 2012

_____)	
CEQUENT PERFORMANCE PRODUCTS, INC.)	
)	Opposition No. 91210360
)	
)	
)	
v.)	
)	
ILES PROFESSIONAL ENGINEERING CORP.)	
)	
)	
)	
)	
_____)	

OPPOSER’S MOTION FOR DEFAULT JUDGMENT

Cequent Performance Products, Inc. (“Opposer”) brings the present Motion for Default Judgment pursuant to TBMP §312.01.

On April 23, 2013, Cequent Performance Products, Inc. (“Opposer”) filed and served its Notice of Opposition against ILES Professional Engineering Corp (“Applicant”) for its U.S. Trademark Application Serial No. 77/938,369. Applicant’s answer was initially due on June 3, 2013. However, Opposer filed a Notice Regarding Service of Notice of Opposition on May 10, 2013 indicating the uncertain status of its service upon Applicant. In response, the USPTO attempted service by mail at Applicant’s last know address, which was returned as undeliverable. Accordingly, on August 6, 2013 the USPTO served notice of the current opposition on Applicant by publication in the Office Gazette.

Applicant's 30 day period in which to appear following notice by publication expired on September 5, 2013. Counsel for Opposer has not received a communication from Applicant or its counsel nor has Applicant entered an appearance in the opposition.

It does not appear that Applicant intends to respond or otherwise participate in this opposition proceeding. Therefore, Opposer hereby requests, pursuant to 37 C.F.R. §2.106(a), the TTAB enter a default judgment against Applicant on all counts in the Notice of Opposition. Action in accordance with this request is respectfully requested.

Respectfully submitted,
Cequent Performance Products, Inc.

By: /William A. McKenna/
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Attorney for Opposer
Cequent Performance Products, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being sent via international first class mail this September 6, 2013 in an envelope addressed to:

Mr. Ilir Beshiri, President
ILES Professional Engineering Corporation
574 Cora Greenwood Dr.
Windsor N8P 1K1, CANADA

Mr. Gerald. E. Trottier
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By: William A. McKenna/