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

Proceeding	91212043
Party	Plaintiff Herschend Family Entertainment Corporation
Correspondence Address	CHRISTOPHER HOLLAND SMITH GAMBRELL & RUSSELL LLP 1230 PEACHTREE ST NE, SUITE 3100 ATLANTA, GA 30309 UNITED STATES caholland@sgrlaw.com
Submission	Motion for Default Judgment
Filer's Name	Christopher Holland
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Date	11/04/2013
Attachments	SilverDollarPawnMotion.pdf(14185 bytes )

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

In the matter of Trademark Application:

Serial No. : 85/626,880  
Applicant : Jimmie DeRamus  
Filed : May 16, 2012  
Mark : SILVER DOLLAR PAWN & JEWELRY, ALEXANDRIA, LA, E  
PLURIBUS UNUM, IN GOD WE TRUST (& Design)

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on April 16, 2013

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Herschend Family Entertainment Corporation,	)	
a Missouri Corporation,	)	
	)	
Opposer,	)	
	)	Opposition No.: 91212043
v.	)	
	)	
Jimmie DeRamus,	)	
	)	
Applicant.	)	

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**BOX TTAB NO FEE**  
Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, Virginia 22202-3514

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

Herschend Family Entertainment Corporation (Plaintiff), by its attorneys, hereby moves the Trademark Trial and Appeal Board (Board) for an order granting them default judgment pursuant to 37 C.F.R. 2.114(a) based on the failure of Jimmie DeRamus (Defendant) to file an answer to Plaintiff's Notice of Opposition.

Specifically, Plaintiff filed its Notice of Opposition on August 14, 2013. The Board thereafter set the deadline of September 23, 2013 for Defendant to file an Answer. On

September 20, 2013, Defendant filed a motion for a thirty-day extension of time to answer, setting October 23, 2013 as the new deadline to file an answer. To date, more than one week after the deadline set in the Defendant's motion and approved by the Board, Defendant has not served Plaintiff with an Answer, and the records from the Board published on the TTABVUE website indicate that the Defendant has not submitted an Answer.

In view of the Defendant's failure to file an Answer to Plaintiff's Notice of Opposition within the extension period, Plaintiff submits that the Board should issue an order granting Plaintiff's request for default judgment.

Respectfully submitted,

SMITH, GAMBRELL & RUSSELL LLP

By:           /Christopher Holland/          

Christopher A. Holland  
Attorney for Petitioner

November 4, 2013  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER has been served upon counsel for the Defendant, Jimmie DeRamus, on November 4, 2013, by depositing same with sufficient postage as First Class mail in an envelope addressed to:

Christopher Salary, Esq.  
Provosty & Gankendorff, LLC  
650 Poydras Street, Suite 2700  
New Orleans, Louisiana 70130

Respectfully submitted,

SMITH, GAMBRELL & RUSSELL, LLP

By:           /Christopher Holland/            
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