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

Proceeding	91213584
Party	Defendant Toys Tekk
Correspondence Address	SHUN C CHEN LAW OFFICES OF SHUN C CHEN 4521 CAMPUS DRIVE #324 IRVINE, CA 92612-2621 UNITED STATES shunchen@att.net
Submission	Other Motions/Papers
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Date	07/02/2015
Attachments	Obj.Fee.pdf(40958 bytes )

Serial No. **85867803**

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

Jaguar Land Rover Limited,	)	
	)	Serial No. <b>85867803</b>
Opposer,	)	Opposition No. <b>91213584</b>
	)	
v.	)	
	)	
Toys Tekk Corporation,	)	
	)	
Applicant.	)	

**APPLICANT’S OBJECTION TO OPPOSER’S  
MISSTATEMENT ON BOARD ACTION**

Applicant, Toys Tekk Corporation, (“Applicant”), hereby opposes Opposer’s Response to Applicant’s Late Payment of Fees dated June 4, 2015:

Opposer falsely stated “On January 30, 2014, the Board issued an Order dismissing this counterclaim (against the ‘825 registration) on the basis of Applicant’s nonpayment of the requisite fee.”

There was no dismissal. Opposer made a false and misleading statement in bad faith.

Dated: July 2, 2015

Respectfully submitted,

By: /Shun C. Chen/  
Shun C. Chen  
Attorney for Applicant

**LAW OFFICES OF SHUN C. CHEN**

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**CERTIFICATE OF SERVICE**

I, Shun C. Chen, hereby certify that I served the

**APPLICANT'S OPPOSITION TO OPPOSER'S  
MOTION FOR PARTIAL SUMMARY JUDGMENT  
AND BRIEF IN SUPPORT**

in a sealed envelope, on July 2, 2015, by first-class mail, with postage fully affixed thereon, and deposited in the United States Postal Service Depository in Irvine, California, to

Brooks Kushman P.C.  
1000 Town Center, 22<sup>nd</sup> Floor  
Southfield, MI 48075

The foregoing documents is also transmitted the aforesaid counsel by e-mail.

This certificate of service is signed on July 2, 2015.

/Shun C. Chen/  
Shun C. Chen