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

Proceeding	91216759
Party	Plaintiff Paramount Citrus LLC
Correspondence Address	Danielle M. Criona 11444 W. Olympic Blvd. 7th Floor Los Angeles, CA 90064 UNITED STATES dcriona@roll.com, mrivera@roll.com
Submission	Motion for Default Judgment
Filer's Name	Danielle M. Criona
Filer's e-mail	dcriona@roll.com, mrivera@roll.com
Signature	/s/ Danielle M. Criona /s/
Date	07/31/2014
Attachments	Opposer Motion for Default re HAROL (US).pdf(81838 bytes)

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

PARAMOUNT CITRUS LLC,)	
)	Opposition No. 91216759
Opposer,)	
)	Application Serial No. 85/668,196
v.)	HAROL
)	
Luthufuddeen Puthiya Kutty Mappelgath)	Published in the <i>Official Gazette</i> of
)	February 11, 2014
Applicant.)	
)	OPPOSER'S MOTION FOR DEFAULT
)	JUDGMENT
)	
)	

Paramount Citrus LLC, on behalf of itself and its affiliates, related companies, and licensees (collectively, "Opposer") hereby requests the entry of Default Judgment, pursuant to 37 C.F.R. §2.114(a) and Fed. R. Civ. P. 55(b), against HAROL, Serial Number 85/668,196 (the "Application" or the "HAROL Mark"), filed by Luthufuddeen Puthiya Kutty Mappelgath ("Applicant") for failure to Answer.

Opposer filed the Notice of Opposition of the Application owned by Applicant in the instant proceeding, and served correspondent for Applicant via U.S. Mail, on June 10, 2014 (the "Opposition"). [TTAB Docket No. 1.]

Applicant has not filed an Answer in this proceeding and has not contacted Opposer for any extension of time to file an Answer.

Pursuant to 37 C.F.R. §2.114(a) and Fed. R. Civ. P. 55(b), since Applicant has not filed an

Answer to the Opposition, Applicant has not requested or been granted any extensions, and no good cause for not answering exists, Applicant is in default.

WHEREFORE, since Applicant is in default and has failed to show good cause why Default Judgment should not be entered against it, Opposer respectfully requests this Motion be granted, Default Judgment be entered against Applicant, and the HAROL Mark be denied registration.

Respectfully Submitted,

PARAMOUNT CITRUS, LLC

Date: July 31, 2014

By: /s/ Danielle M. Criona /s/

Danielle M. Criona, Esq.

Roll Law Group P.C.

11444 West Olympic Blvd., 7th Floor

Los Angeles, California 90064

Tel. (310) 966-8771

Fax (310) 966-8810

Email: dcriona@roll.com

CERTIFICATE OF SERVICE

I, Mark Rivera hereby certify that a copy of this MOTION FOR DEFAULT has been served upon Applicant:

Mr. Stephen L. Anderson
Anderson & Associates
27247 Madison Ave., Suite 121
Temecula, CA 92590

by first class mail, postage prepaid, with a courtesy copy to email address on file with the USPTO, attorneys@brandexperts.com on this 31st day of July, 2014.

By: 

Mark Rivera
Roll Law Group P.C.
11444 West Olympic Blvd.
Los Angeles, CA 90064
Tel. (310) 966-5728
Fax (310) 966-5758