

ESTTA Tracking number: **ESTTA744794**

Filing date: **05/06/2016**

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

Proceeding	91217630
Party	Defendant Hansen, Gary, St. Martin
Correspondence Address	GARY ST MARTIN HANSEN 399 LOWER MAIN WEST JOHNSON, VT 05656-9636 UNITED STATES stdrumr@Gmail.om
Submission	Other Motions/Papers
Filer's Name	Gary St. Martin Hansen
Filer's e-mail	stdrumr@gmail.com
Signature	/Gary St. Martin Hansen/
Date	05/06/2016
Attachments	Answer to Motion for order to show cause.doc-signed.pdf(649126 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD  
In the matter of Trademark Application Serial No. 86/112,261  
Trademark: IT’S A BLACK HILLS THING! YOU WOULDN’T  
UNDERSTAND, ‘TILL YOU BEEN HERE!

Filed: November 6, 2013

Published: April 1, 2014

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Sturgis Motorcycle Rally, Inc., )  
)  
)  
Opposer, )  
) Opposition No. 91217630  
v. )  
)  
Gary St. Martin Hansen, )  
)  
Applicant. )

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ANSWER TO MOTION FOR ORDER TO SHOW CAUSE .

Opposer claims Applicant has sought and received two suspension periods to allow him to retain counsel; twice, he has failed to do so within the time permitted to him.

Most recently, in allowing him up until May 2, 2016 “to inform the Board whether he wishes to represent himself in these proceedings or has retained counsel,” the Board clearly stated that “[i]f

Applicant fails, during the time allowed, to either appoint new counsel (and inform the Board thereof) or file a paper stating that he desires to represent himself, the Board may  
i  
ssue an order...asking Applicant to show cause why default judgment should not be ordered.

Answer : The Applicant twice stated in the his “ANSWER TO  
Oppositions Motion To Strike : filed April 27<sup>th</sup> on ESSTA, and served by  
email April 27<sup>th</sup> as agreed upon in conference call of April 20<sup>th</sup> with  
Wendy Cohen, that

No1” **The Applicant is willing, pro se or otherwise to be deposed ...”**

No.2” **The Applicant will agree to a deposition at Johnson State  
College, “**

The date of this motion is May 5, 2016, and Applicant has neither filed  
nor served Opposer with any paper complying with the Board’s Order  
dated April 20, 2016.

THIS IS NOT TRUE! As above statements verify.

In addition, from Applicant’s email, is an email from Attorney Aaron

Davis:

to me

Aaron Davis [davis@ptslaw.com](mailto:davis@ptslaw.com)

May 4 )

**Gary,**

**As I mentioned to you before, I cannot represent you due to potential conflicts between you and my current clients.**

**I wish you**

**the best of luck with your case.**

**Aaron**

**Aaron W. Davis**

Applicant thus respectfully requests that the Board NOT to issue an Order to Show Cause against Applicant ! in accordance with its Order dated April 20, 2016.

Dated: May 6, 2016

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Certificate of Filing

The undersigned certifies that this correspondence has been Filed via Electronic means by filing with the Electronic System for Trademark Trial and Appeals

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Respectfully Submitted,

*Gary St. Martin Hansen*

Gary St. Martin Hansen

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Certificate of Service

The undersigned pro se of record hereby certifies that a copy of the foregoing Answer To Motion for Order to Show Cause was served by email May 6<sup>th</sup> 2016 to:

SNEED PLLC, Of Counsel  
610 Jetton St., Suite 120-107  
Davidson, North Carolina 28036  
Tel.: [844-763-3347](tel:844-763-3347)

Email: [sarah@sneedlegal.com](mailto:sarah@sneedlegal.com) o

May 6, 2016.

Gary St. Martin Hansen

*Gary St. Martin Hansen*

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Pro se for Applicant