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

Proceeding	91220720
Party	Defendant Carrot Creative, LLC
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Date	06/18/2015
Attachments	B1887153.pdf(111567 bytes )

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

DENTSU AEGIS NETWORK FRANCE	)	
Opposer,	)	Opposition No. 91220720
	)	
v.	)	Mark: <b>CARROT</b>
	)	
CARROT CREATIVE, LLC,	)	Application No. 86/232710
	)	
Applicant.	)	
	)	

**RESPONSE TO NOTICE OF DEFAULT AND ORDER TO SHOW CAUSE AND  
CONSENTED TO MOTION TO REINSTATE AND SUSPEND**

Applicant, by and through their undersigned counsel, hereby responds to the notice of default and order to show cause issued on June 4, 2015 (the “OSC”).

While Applicant did receive the Notice of Opposition from the Trademark Trial and Appeal Board, an inadvertent error in Applicant’s counsel’s docketing department resulted in an incorrect docket entry for the Answer date and thus the Answer was not filed in a timely manner. Applicant request that the Board reinstate this matter and suspend proceedings while the parties continue to negotiate settlement. Counsel for Opposer, Susan Upton Douglass, consented to reinstatement and suspension via an email exchange with counsel for Applicant on June 17, 2015.

**CONCLUSION**

For the reasons set forth above, the Trademark Trial and Appeal Board should reinstate and suspend the Opposition.

Respectfully submitted,

CARROT CREATIVE, LLC

By its attorneys,

Dated: June 18, 2015

/Lawrence R. Robins/

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DENTSU AEGIS NETWORK FRANCE

By its attorneys,

Dated: June 18, 2015

/Susan Upton Douglass/

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the Applicant at its address of record by e-mail on June 18, 2015.

Susan Upton Douglass <sdouglass@frosszelnick.com>  
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Dentsu Aegis Network France

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