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

Proceeding	91221486
Party	Plaintiff Fagron Group B.V. besloten vennootschap
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Submission	Motion for Default Judgment
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Date	06/01/2015
Attachments	Varon Motion for Default Judgment.pdf(10028 bytes )

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

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FAGRON GROUP B.V.,	:	
	:	
Opposer,	:	
	:	
v.	:	Mark: VARON & Design
	:	Serial No.: 86/203,239
DAVID REYNALDO CARUAJULCA YPENZA;	:	Filed: February 25, 2014
SALOMON CESAR IPENZA DUMETT;	:	Published: February 10, 2015
MARIA ANTONIA YPENZA DUMETT,	:	
	:	Opposition No. 91221486
Applicants.	:	
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**MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER**

On April 14, 2015, Opposer Fagron Group B.V. (“Fagron”) filed a Notice of Opposition against Application Serial No. 86/203,239 for the mark VARON & Design (the “Varon Mark”) filed by applicants David Reynaldo Caruajulca Ypenza, Salomon Cesar Ipenza Dumett, and Maria Antonia Ypenza Dumett (the “Applicants”), for use in connection with goods in International Classes 3 and 5. Applicants’ answer to the Notice of Opposition was due May 25, 2015. No answer was filed or served by May 25, 2015, and as of the filing date of this Motion for Default Judgment, no answer was filed or served.

Accordingly, Fagron respectfully moves for a default judgment against Applicants sustaining the Opposition and denying registration of the Varon Mark for the goods identified in Application Serial No. 86/203,239.

Dated: June 1, 2015  
New York, New York

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ Pou-I "Bonnie" Lee  
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*Attorneys for Opposer Fagron Group B.V.*

**CERTIFICATE OF SERVICE**

I, Pou-I “Bonnie” Lee, hereby certify that a copy of the foregoing Motion for Default Judgment was served on the person listed below by first class mail, postage prepaid, and email on June 1, 2015:

Elsa Torres  
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*Domestic Representative/Correspondent for Applicants*

/s/ Pou-I “Bonnie” Lee  
Pou-I “Bonnie” Lee