

ESTTA Tracking number: **ESTTA741584**

Filing date: **04/21/2016**

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

Proceeding	91226815
Party	Plaintiff Conopco, Inc.
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Submission	Motion for Default Judgment
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Date	04/21/2016
Attachments	Opposer's Motion for Entry of Default Judgment.pdf(62278 bytes)

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

In the Matter of Serial No. 86/704,515

For the Mark: *CareSse*

Filed on July 24, 2015

Published in the *Official Gazette* on February 9, 2016

CONOPCO, INC.,

Opposer,

- *against* -

ADVANCED POLYMER INC.,

Applicant.

Opposition No.: 91226815

OPPOSER'S MOTION FOR ENTRY OF DEFAULT JUDGMENT

Pursuant to Rule 508 of the Trademark Trial and Appeal Board Manual of Procedure, opposer Conopco, Inc. ("Opposer") hereby moves the Trademark Trial and Appeal Board (the "Board") to enter default judgment against applicant Advanced Polymer Inc. ("Applicant"). As grounds in support of this Motion, Opposer asserts as follows:

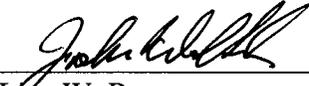
1. Opposer filed its Notice of Opposition in this proceeding on March 10, 2016.
2. Pursuant to the Board's March 10, 2016 scheduling order, Applicant's deadline to file an answer in this proceeding was April 19, 2016. Applicant did not file an answer by that date.
3. To date, Applicant still has not filed an answer or any papers in response to the Board's March 10, 2016 scheduling order.

WHEREFORE, Opposer prays that this Motion be granted, that default judgment be entered against Applicant, and that the opposition be sustained in Opposer's favor.

Respectfully submitted,

Dated: April 21, 2016

BAKER & MCKENZIE LLP

By: 

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Attorneys for Opposer Conopco, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for Entry of Default Judgment was served on this 21st day of April, 2016 via First Class Mail, postage prepaid on the applicant, Advanced Polymer Inc., at the following address:

Advanced Polymer Inc.
4208 185th Place SE
Issaquah, Washington 98027



Sonia Allahdad