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

Proceeding	91229832
Party	Plaintiff International IP Holdings, LLC
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Submission	Motion for Default Judgment
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Date	10/18/2016
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

International IP Holdings, LLC,

Opposer,

v.

Laboratorios Pisa, S.A. De C.V.,

Applicant.

Mark: ELECTRO LIFE and
Running Man Design



Serial No.: 86/582,197

Opposition No. 91229832

OPPOSER'S MOTION AND BRIEF FOR DEFAULT JUDGMENT

Opposer International IP Holdings, LLC, by and through its counsel, Oakland Law Group, PLLC, hereby moves for entry of default judgment pursuant to TBMP §312.01 and Fed. R. Civ. P. 55, and in support thereof states:

1. On August 31, 2016, Opposer filed a Notice of Opposition against Applicant

Laboratorios Pisa, S.A. De C.V.'s pending application for the mark
(Serial No. 86/582,197).



2. Per the Board's scheduling order dated August 31, 2016, the Applicant's answer was due on October 10, 2016.
3. To date, the Applicant has failed to file responsive pleadings.

4. Therefore, per TMBP §312.01, Opposer moves for entry of default judgment in the Opposer's favor against the Applicant.

Wherefore, Opposer International IP Holdings, LLC respectfully requests entry of judgment in its favor against Applicant Laboratorios Pisa, S.A. De C.V., registration of the mark bearing U.S. Trademark Application Serial Number 86/582,197 be refused, and for such further relief as this Honorable Board deems appropriate.

Respectfully submitted,
OAKLAND LAW GROUP, PLLC

/Paul R. Hoffer/

Date: October 18, 2016

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CERTIFICATE OF SERVICE

The Undersigned hereby certifies that on this 18th day of October, 2016, a true copy of the foregoing document entitled, "Motion and Brief for Default Judgment" is being served on the following Counsel of Record via First Class Mail:

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