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

Proceeding	92058543
Party	Plaintiff Edge Games Inc
Correspondence Address	TIM LANGDELL EDGE GAMES INC 530 SOUTH LAKE AVENUE 171, PASADENA, CA 91101 UNITED STATES uspto@edgegames.com, tim@edgegames.com
Submission	Motion for Default Judgment
Filer's Name	Rev Dr Tim Langdell
Filer's e-mail	tim@edgegames.com
Signature	/Tim Langdell/
Date	08/15/2014
Attachments	MotionForSummaryJudgment15Aug14.pdf(164925 bytes)

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

EDGE GAMES, INC., Petitioner v. RAZER (ASIA-PACIFIC) PTE LTD Registrant.	**Cancellation No 92058543** **Registration No. 4394393** **Mark "EDGE"**

MOTION FOR SUMMARY JUDGMENT

Petitioner, Edge Games, Inc., attempted to timely comply with the Board's order for the parties to have a Discovery Conference by the deadline of 4/1/14. Petitioner sought to have said conference both telephonically and in writing (See Exhibit A attached), but Registrant failed/refused to respond to Petitioner and Registrant made no attempt itself to enter into any such Discovery Conference. Petitioner proposed that the parties either enter into mediation or arbitration to settle the dispute, but again Applicant has refused to respond.

Petitioner has since made numerous efforts to encourage Registrant to participate in the Discovery process, but Registrant has refused to participate.

Accordingly, since it would appear that Registrant has no intention of following or adhering to the Board's order of 21 January 2014, and since Registrant missed this important procedural deadline and has made no attempt at all to participate in discovery, Petitioner asks that the Board grant summary judgment in Petitioner's favor.

Respectfully submitted this day August 15, 2014,

Rev Dr Tim Langdell, CEO Petitioner in Pro Per/Se
Edge Games, Inc.
530 South Lake Avenue, 171
Pasadena, CA 91101
Tel: 626 449 4334; Fax: 626 844 4334; Email: tim@edgegames.com

EXHIBIT A

Mr Keith A. Barritt, Esq
Fish & Richardson P.C.
1425 K Street, N.W.
11th Floor
Washington, DC 20005

March 28, 2014 Via Facsimile & Email

Re: EDGE Trademark Cancellation Action in the U.S.
Your Ref.: 29631-0019PP1
Discovery Conference

Dear Mr Barritt:

We also write regarding fulfillment of our discovery conference obligations under 37 CFR Section 2.120(a)(2).

We wish a telephone conference with you, since we do not believe that written exchanges will adequately and acceptably fulfill the requirements for this conference stage.

1. Nature and Basis of Defenses.
We do not accept that your answer to the petition makes clear what the basis for defense is. Indeed, Razer would appear to have no acceptable or adequate defense, and if your client has one then we would very much like to be made aware of it so that we may consider what it considers this "defense" to be.

2. Possibility of Settlement/Narrowing of Claims and Defenses
We have made our offer for settlement which your client has rejected despite it being a very fair and reasonable offer. At the least the parties should consider at this stage the possibility of narrowing the claims and defenses. For instance, your client would appear to have no defense whatsoever against our claim that we have (via our licensee Velocity) used the exact mark for the effectively exact same goods and services for well over a decade prior to your client's first use. We suggest at least that the parties agree that your client has no defense to this key claim.

3. Disclosures etc.
a) We see no reasonable argument as to why we should dispense with initial disclosure requirements, not least since we cannot see that your client has any defense against our

EDGE Games, Inc.,
530 South Lake Avenue, 171, Pasadena, California, 91101
T: 626 449 4EDGE F: 626 844 4EDGE W: www.edgegames.com E:corp@edgegames.com

key claims. Having initial disclosure might assist us in understanding why your client is fighting our claim or may perhaps clarify to your client that it has indeed no defense.

b) Agreed

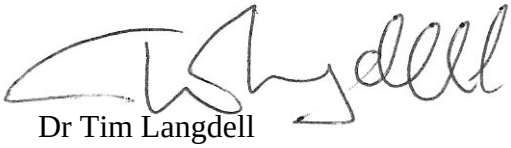
c) Why do you ask this? We will make our decision following your clarification.

d) We too have no other proposals at this stage but reserve the right to make such at a later time.

e) Agreed.

We look forward to hearing from you,

Kind regards,



Dr Tim Langdell
CEO.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing MOTION FOR SUMMARY JUDGMENT in respect to Cancellation proceeding No. 92058543 was served on Registrant via first class mail, postage prepaid, this day August 15, 2014:

Keith A Barritt
Fish & Richardson PC
PO Box 1022
Minneapolis
MN 55440-1022

Rev Dr Tim Langdell