

ESTTA Tracking number: **ESTTA631886**

Filing date: **10/09/2014**

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

Proceeding	92059476
Party	Plaintiff Geoffrey, LLC
Correspondence Address	TIMOTHY D PECSENYE BLANK ROME LLP ONE LOGAN SQUARE PHILADELPHIA, PA 19103-6998 UNITED STATES pecsenye@blankrome.com, mhomyk@blankrome.com
Submission	Motion for Default Judgment
Filer's Name	Matthew A. Homyk
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Date	10/09/2014
Attachments	budzruz motion for default judgment.pdf(84366 bytes)

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

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GEOFFREY, LLC,	:	
	:	
Petitioner,	:	Reg. No.: 4,550,100
	:	
v.	:	Mark: BUDZRUZ
	:	
ERIC KLOSE,	:	Canc. No. 92059476
	:	
Registrant.	:	
<hr/>	:	

Hon. Commissioner for Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451

Att'n: Trademark Trial and Appeal Board
Andrew P. Baxley, Esquire

MOTION FOR DEFAULT JUDGMENT

Geoffrey, LLC ("Petitioner"), Petitioner in the above-referenced action, hereby moves that the Trademark Trial and Appeal Board enter a default judgment against the Registrant, Eric Klose ("Registrant"), pursuant to Federal Rule of Civil Procedure 55(b), 37 C.F.R. 2.106(a), and TBMP § 312.01, for failure to file an answer to Petitioner's Petition to Cancel Registration No. 4,550,100 within the time period prescribed by the Trademark Trial and Appeal Board.

On June 30, 2014, Petitioner filed a Petition to Cancel Registration, commencing the instant proceeding. On June 30, 2014, Petitioner served a copy of the Petition to Cancel Registration on Registrant pursuant to Trademark Rule 2.101. On

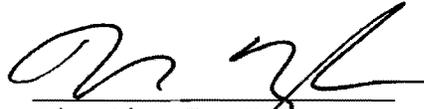
July 1, 2014, the Trademark Trial and Appeal Board sent a notice of this proceeding to Registrant, and a scheduling order setting the response date for Registrant to file its answer as August 10, 2014. Registrant did not file or serve an answer to the Petition to Cancel Registration on or before August 10, 2014, and has not filed or served an answer to date.

WHEREFORE, Petitioner prays that a default judgment be entered against Registrant in accordance with Federal Rule of Civil Procedure 55(b), that this cancellation be sustained, and that Registration No. 4,550,100 be cancelled.

Respectfully submitted,

BLANK ROME LLP

Date: October 9, 2014



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Attorneys for Petitioner
Geoffrey, LLC

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this correspondence is addressed to the Trademark Trial and Appeal Board, Hon. Commissioner for Trademarks, P.O. Box 1451, Alexandria, Virginia 22313-1451, and is being deposited via the Electronic System for Trademark Trials and Appeals (ESTTA) on October 9, 2014.

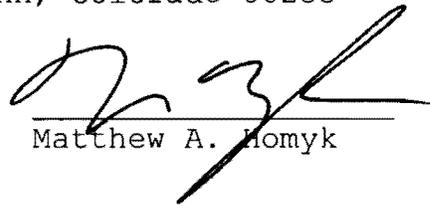


Matthew A. Homyk

CERTIFICATE OF SERVICE

I, Matthew A. Homyk, hereby certify that on October 9, 2014, I caused a true copy of the foregoing Motion for Default Judgment to be served by U.S. First Class Mail on Registrant:

Eric Klose
2714 East 109th Avenue
Northglenn, Colorado 80233



Matthew A. Homyk