

ESTTA Tracking number: **ESTTA664889**

Filing date: **04/03/2015**

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

Proceeding	92060328
Party	Defendant Souki Manufacturing Inc.
Correspondence Address	SOUKI MANUFACTURING INC 326-6 SAKAMOTO-CHO, HODOGAYA-KU, YOKOHAMA-SHI KANAGAWA, 240-0043 JAPAN mina-csj@nifty.com
Submission	Other Motions/Papers
Filer's Name	Nobuhiko Minaki
Filer's e-mail	mina-csj@nifty.com
Signature	/N.Minaki/
Date	04/03/2015
Attachments	CCF20150404.pdf(807515 bytes)

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

Plaintiff Trademark: LOVE IS FOREVER
Serial Number: 86285762
Filing Date: May 19, 2014
Refusal Issue/Mailing Date: August 27, 2014

Defendant Trademark: LOVE IS FOREVER ®
Registration No.: 3811074
Filing Date: May 13, 2009
Registration Date: June 29, 2010
Trademark Creator, Owner, User

Plaintiff	L.A.Gem and Jewelry Design, Inc.
Assigned Attorney	MR. MILORD A. KESHISHIAN Cancellation No.: 92060328
Defendant	Souki Manufacturing Inc.
No Assigned Attorney	Nobuhiko Minaki (Mr.) Representative Director Trademark Creator, Owner, User

April 04, 2015

Ref number: Souki 150401

MADAM MARY CATHERINE FAINT
INTERLOCUTORY ATTORNEY

Dear Madam,

DEFENDANT'S PETITION FOR CONSIDERATION
TO ADD D RESPONSE TO P MOTION TO STRIKE AS STANDARD
ETC TO JUDGE APPROPRIATENESS OF PETITIONER'S MOTION TO STRIKE

If my/D RESPONSE TO P MOTION TO STRIKE, of 29 pages, dated March 19, 2015 to/for PETITIONER'S MOTION TO STRIKE raised 03/05/2015 by plaintiff is to be listed/considered as a standard etc for judgment regarding appropriateness of PETITIONER'S

MOTION TO STRIKE, it will be my great pleasure due to the following reasons.

Reason 1: My/D RESPONSE TO P MOTION TO STRIKE, of 29 pages, dated March 19, 2015 is very germane to the PETITIONER'S/PLAINTIFF'S MOTION TO STRIKE.

Reason 2: If it is respected that the PRINCIPLE OF THE EQUAL OPPORTUNITY, I think my/D RESPONSE TO PLAINTIFF'S MOTION TO STRIKE is to be listed/considered as a standard for judgment regarding appropriateness of PLAINTIFF'S MOTION TO STRIKE.

Attacking by plaintiff has done 2 times as follows and/but defendant's defensing will be 1 time only if my/DEFENDANT'S RESPONSE is to be disregarded.

- 1) Petition for cancellation, attacking by PLAINTIFF, done 11/05/2014.
- 2) Answer/defensing by DEFENDANT done/dated 02/13/2015.
- 3) Motion to strike/attacking by PLAINTIFF done 03/05/2015.

If my/D RESPONSE/defensing, of 29 pages, dated March 19, 2015 TO PLAINTIFF'S MOTION TO STRIKE is to be not listed/considered as a standard etc for judgment, it is to be that plaintiff's attacking 2 times vs. defendant's responding/defensing 1 time only, which is not equal in OPPORTUNITY, I feel.

Very truly sincerely yours,



Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Trademark Creator, Owner, User

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