

ESTTA Tracking number: **ESTTA665128**

Filing date: **04/06/2015**

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	04/06/2015
Attachments	CCF20150407.pdf(2091669 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 06, 2015

Ref number: Souki 150403

MADAM MARY CATHERINE FAINT  
INTERLOCUTORY ATTORNEY

Dear Madam,

I would like to report that I have served/mailed the documents as follows to the assigned attorney, Mr. Milord A. Keshishian.

Attached: 1) Certificate of Service 1 page  
2) The document served/mailed 2 pages  
3) The receipt etc of Japan post 1 page

Very truly sincerely yours,

*N. Minaki*

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

TEL 81-45-333-4525 81-45-332-7890 direct

FAX 81-45-515-0047 E-MAIL [mina-csj@nifty.com](mailto:mina-csj@nifty.com)

Certificate of Service

I hereby certify that a true and complete copy of the document,  
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,  
as enclosed have been served on MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES,  
PC by mailing said copy on April 04, 2015 via First Class Mail, EMS, postage prepaid to:  
MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES, PC 2049 CENTURY PARK  
EAST, SUITE 3850 LOS ANGELES, CA 90067, UNITED STATES.

Enclosed: DEFENDANT' PETITION...PETITIONER'S MOTION TO STRIKE 2 pages  
Receipt etc of Japan Post 1 page

Date: April 06, 2015

Signature:



Nobuhiko Minaki

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki

Representative Director

Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 mina-csj@nifry.com

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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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

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

TEL 81-45-333-4525 81-45-332-7890 direct

FAX 81-45-515-0047 E-MAIL mina-csj@nifty.com

# The receipt etc of Japan Post



国際スピード郵便

郵便

**JAPAN**  
 お問い合わせ番号  
 Item number **EF 727 252 126 JP**

受付時刻 時(Hour) 分(Minute)  
 Time mailed **1 9 0 9**  
 郵便料金 諸料金  
 総重量  
 Total gross weight **60 g**  
 合計金額  
**1,200** 円(Yen)

8 From (ご依頼主)  
 4 受付年月日 Date mailed  
**2015. 4. 6**  
 Name  
**Nobuhiko Minaki**  
 Address  
**Souki Manufacturing Inc.  
 326-6 Sakamoto-cho  
 Hodogaya-Ku, Yokohama-shi  
 Kanagawa**  
 9 Postal code **JAPAN**  
 (郵便番号) **240-0043**  
 7 ご依頼主電話番号 / FAX番号 Telephone No. / Fax No.  
**81-45-332-7890 TEL**  
**81-45-515-0047 FAX**

TO (お届け先)  
**Mr. Milord A. Keshishian**  
**Attorney**  
**Milord & Associates, PC**  
**2049 Century Park East, Suite 3850**  
**Los Angeles, CA 90067**  
 (郵便番号) Postal code  
 (国名) Country **USA**  
 TEL/FAX

ご記入後、  
 ご依頼主  
 様控とし  
 取りくだ  
 Please det  
 the Sender's (



## 領収証書 ← Receipt

毎度ありがとうございます

様  
 〒100-8798 日本郵便株式会社  
 東京都千代田区霞が関1-3-2  
 2015年 4月 6日 19:10

Date/Time presented/received

[別納2]  
 EMS第2 A

60.0g	
1通	¥1,200
小計	¥1,200
課税計 (内消費税等)	¥0
非課税計	¥1,200
合計	¥1,200
お預り金額	¥1,200

印紙税申告納  
 付につき廻町  
 税務署承認済

担当 安藤 健治  
 発行No.7056 端03箱01  
 連絡先: 保土ヶ谷郵便局  
 TEL:045-333-7423