

ESTTA Tracking number: **ESTTA666948**

Filing date: **04/16/2015**

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	04/16/2015
Attachments	CCF20150416.pdf(2635374 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

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 16, 2015

Ref number: Souki 150410

MADAM MARY CATHERINE FAINT

Interlocutory Attorney

Dear Madam,

Presenting Certificate of Service

I would like to present the attached 1) Certificate of Service including the attached 2) (1) (2) (3).

Attached:

- 1) Certificate of Service: 1 page
- 2) The attached to the above Certificate of Service:
 - (1) Letter for/to Madam Mary Catherine Faint, Interlocutory Attorney, whom

defendant/I respectfully asked regarding it necessary or not to reduce the
29 pages of **the document** to 25 pages or less than
25 pages. **The document** is of dated April 08, 2015
Ref number: Souki 150404: 2 pages

(2) Letter sent with the above (1) for/to Mr. Milord A. Keshishian, Assigned Attorney,
dated April 11, 2015 Ref number Souki 150406 explaining the
purpose etc regarding presenting the above (1) letter for/to
Madam Mary Catherine Faint, Interlocutory Attorney: 2 pages

(3) Receipt of/by Japan Post for the above (1) and (2): 1 page

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

Certificate of Service

I hereby certify that the true and complete copy of the concerned/attached document (1) as attached/mentioned below have been served on MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES, PC by mailing said copy on April 11, 2015 via First Class Mail, EMS, service of Japan Post, postage prepaid to: MR. MILORD A. KESHISHIAN MILORD & ASSOCIATES, PC 2049 CENTURY PARK EAST, SUITE 3850 LOS ANGELES, CA 90067, UNITED STATES. The attached (2) (3) are for certain for this service done.

Attached:

- (1) Letter for/to Madam Mary Catherine Faint, Interlocutory Attorney, whom defendant/I respectfully asked regarding it necessary or not to reduce the 29 pages of **the document** to 25 pages or less than 25 pages. **The document** is of dated April 08, 2015
Ref number: Souki 150404: 2 pages
- (2) Letter sent with the above (1) for/to Mr. Milord A. Keshishian, Assigned Attorney, dated April 11, 2015 Ref number Souki 150406, explaining the purpose etc regarding presenting the above (1) letter for/to Madam Mary Catherine Faint, Iterlocutory Attorney: 2 page
- (3) Receipt of/by Japan Post for the above (1) and (2): 1 page

Date: April 16, 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

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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~~Trademark Creator, Owner, User~~

Deleted April 16, 2015
N. Minaki

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
	Entrepreneur, Trademark Creator, Owner, User

April 08, 2015

Ref number: Souki 150404

MADAM MARY CATHERINE FAINT
INTERLOCUTORY ATTORNEY

Dear Madam,

Regarding PETITIONER'S REPLY BRIEF IN SUPPORT OF ITS MOTION TO STRIKE RESPONDENT'S ANSWER AND AMENDED ANSWER dated April 03, 2015, prepared by plaintiff, in the page 3 there are the following words, 'Under Rule 2.127(a), a brief on a motion may not exceed 25 pages in length, including table of contents, index of cases, description of record, statement of the issues, recitation of the facts, argument, and summary. Here, Petitioner further objects to Respondent's "opposition" brief because it is excessive at 29 pages in length. Even if Petitioner did not object to the length, the page limitation on a brief

cannot be waived by action, inaction, or consent of the parties. *Saint-Gobain v. Minnesota Mining and Manufacturing Company*, 66 USPTQ2d 1220 (TTAB 2005). Since Respondent's "Opposition" violates the Board's rule regarding page limitations for a brief on motion, it should be considered.'

If your office will order me/defendant to make it, 29 pages, shorter as less than 25 pages or equal to 25 pages, I have been happy to obey to make it, 29 pages, as less than 25 pages or equal to 25 pages, regarding which I/defendant will be happy to wait your office high words etc.

Very truly sincerely yours,

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive, slightly slanted style.

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

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N. Minaki

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 11, 2015

Ref number: Souki 150406

Mr. Milord A. Keshishian
Assigned Attorney for Plaintiff
MILORD & ASSOCIATES, PC

Dear Sir,

I would like to send you the document as follows/attached served for
Madam Mary Catherine Faint, Interlocutory Attorney.

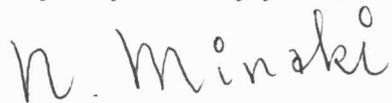
Attached:

Letter served for Madam Mary Catherine Faint, Interlocutory Attorney, whom

defendant/I respectfully asked it necessary or not to reduce the 29 pages
of the the document to 25 pages or less than 25 pages. The document
is of dated April 08, 2015 Ref number: Souki 150404.

2 pages

Very truly sincerely yours,

Handwritten signature of N. Minaki in black ink.

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

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

Receipt of/by Japan Post

国際スピード郵便

JAPAN

お問い合わせ番号
Item number **EF 773 125 093 JP**

From (ご依頼主) 受付年月日 Date mailed
2015. 4. 11

Name Nobuhiko Minaki
Address Souki Manufacturing Inc.
326-6 Sakamoto-cho
Hodogaya-ku, Yokohama-shi
Kanagawa

Postal code (郵便番号) **240-0043** **JAPAN**

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

配達状況お問い合わせ(Track & Trace)
<http://www.post.japanpost.jp>
EMSに関するお問い合わせ
0120-5931-55
(携帯電話からのお客さま) **0570-046686**
(Telephone for English) **0570-046111**
平日(Mon to Fri) **8:00~22:00**
土・日及び休日(Sat, Sun and holidays) **8:00~22:00**

EMS受取書
(Sender's Copy)
正に受領いたしました。
(日付印) Date Stamp

Ref number:
Souki 150406 2pages
Souki 150404 2pages

CA90067

USA

*本受取書は領収証書ではありません。



領収証書 Receipt for payment of ¥1,200,-

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11日 5:42

[別納2]
EMS第2A

¥1,200 72.5g 1通 ¥1,200

小計 ¥1,200

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お預り金額 ¥1,200

150406 2pages
150404 2pages

印紙税申告納
付につき廻町
税務署承認済

担当 小嶋 哲雄
発行No.1709 端01箱20
連絡先: 神奈川県郵便局横浜中央分
室
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