

July 11, 2015

Ref No.: Souki 150702

Mr. Benjamin U. Okeke  
Interlocutory Attorney  
Trademark Trial and Appeal Board  
United States Patent and Trademark Office

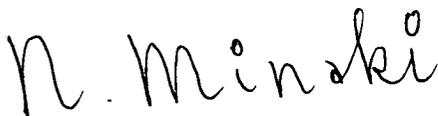
Dear Sir,

Cancellation Case: 92060328 —

According to your order, I would like to present AMENDED ANSWER and Certificate of Service as attached.

Attached: AMENDED ANSWER	31 pages
Certificate of Service	1 page
Receipt of Japan Post	1 page

Very truly sincerely yours,



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

**07-13-2015**

U.S. Patent &amp; TMO/TM Mail Rcpt Dt. #

1/34

||

**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

July 10, 2015  
Ref No.: Souki 150701

**AMENDED ANSWER TO PETITION TO CANCEL**

Being deeply impressed by the high order of Mr. Benjamin U. Okeke, Iterlocutory Attorney, mailed June 12, 2015, defendant/I have prepared this **AMENDED ANSWER**.

The contents are same fundamentally to the ANSWER mailed February 13, 2015 for/to Trademark Trial and Appeal Board, but the style, form and policy etc of this **AMENDED ANSWER** have been prepared according to the high order of Mr. Benjamin U. Okeke, Iterlocutory Attorney mailed June 12, 2015.

In the first part of this **AMENDED ANSWER**, in the part of **I** and **II** etc, I would like to report for fundamental things etc could promote etc high understanding regarding defendant's responses in the part of **III** such as **denial** etc.

In the part of **III**, in the latter part of this **AMENDED ANSWER**, I would like to report/explain my responses such as **deny** etc with reasons etc.

In this **AMENDED ANSWER** if it could be highly understood and allowed for me to mention regarding another case, 92058656, I am highly happy.

Because I am a pro se, amateur in legal matters, and entrepreneur for my current business with no personnel preparing business alone, and I have been heavily damaged/obstructed/troubled by the 92058656, although it was only one case until November 05, 2014. And if adding to 92058656, another case will be added, I will be too troubled to respond safely etc. But I do not know if the assigned attorney, Mr. Milord A. Keshishian, knew my wretched situation, but he filed 92060328.

And actually, I have become heavily damaged/obstructed/troubled, regarding which in order to appeal/explain etc, I am obliged to mention/report 92058656.

If it could be kindly understood and allowed, I am highly happy.

And if it could be kindly understood that I have no intention to consolidate the 2 cases raised by the 2 different plaintiffs, I am highly happy.

NB:

1. The heavy OBSTRUCTION OF BUSINESS to an infant company/firm:

Defendant is an infant company/firm which has been such as under preparation to start to produce its products to sell etc by me alone, without enough capital money etc, with no other personnel, being different from well established/prepared firm/company with no efficient expert staffs such as legal experts and so forth.

So, this case, 92060328 raised by plaintiff, is the so heavy OBSTRUCTION OF BUSINESS to me/defendant including to privacy, and for instance I have been forced to be OBSTRUCTED to stop to visit China to produce my products at factories in

China since filing of 92058656 02/07/2014 and 92060328 11/05/2014 continuously.

2. Meaning of Time to Answer, 07/12/2015:

Regarding meaning of time to answer, making telephone call to 571-272-8500 more than once, I received highly kind and reliable advice of TM Information Specialists of United States Patent and Trademark Office. The advice is that time to answer means that on or before the date I handed to a post office in Japan. So I will hand/present my AMENDED ANSWER for Trademark Trial and Appeal Board of United States Patent and Trademark Office on or before 07/12/2015, the 30th day from 06/13/2015, to a post office in Japan.

3. USA, USPTO, TTAB:

Herein after USA will be used for United States of America, USPTO will be used for United States Patent and Trademark Office and TTAB will be used for Trademark Trial and Appeal Board.

4. Mailing:

I will send by registered air mail including to plaintiff.

5. Certificate of Mailing etc:

In this AMENDED ANSWER, I will attach one page of the Certificate of Service, which I will prepare.

6. Usage of I MY ME etc:

I will use for defendant the word, defendant, and will use the words, I MY ME or WE OUR US for defendant.

7. Evidences:

Regarding proofs, evidences etc of my assertions, I would like to omit in this AMENDED ANSWER.

8. Regarding using ® as LOVE IS FOREVER ® as in the above etc:

Regarding using ® as LOVE IS FOREVER ® as in the above etc, I had started to use it according to the so highly kind advice of an attorney of USA. His advice was given to me at a place in a sightseeing place of the vicinity of Yokohama Japan and it was of on a day of a

weekend or on a holiday of 2010 or so.

After applying for the mark to Japan Patent Office July 1, 2008, for class 14, it was registered May 15, 2009. Being registered by WIPO, World Intellectual Property Organization, May 13, 2009, on the same day application to USPTO was done and registered June 29, 2010. And the highly kind advice of the attorney was given to me at the sightseeing place 2010 or so.

I had started intercept survey by myself regarding LOVE IS FOREVER ® etc from 2008, and from 2009 at the sightseeing place almost every Saturday and Sunday, and holiday if possible. My survey being of a short time one of 1 minute or so with 1 or a few questions without asking individual information as personal name etc of answerer. Answerers are welcome for the short time one but unwelcome for the long one. So, I have to do almost every weekend or so in order to ask various kinds of questions. 50 to more than 100 answerers or so a day. At the early stage as 2009, 2010 around the number a day was small, but through experience becoming skilled, it has become many as 50 to 100 answerers a day etc, and in the summer season the number will be bigger than in cold winter season.

But I have been **obstructed** to do the survey including the start of production of my products, preparation of Internet shop etc from the end of February of 2014 due to the petition to cancel case, 92058656, and in addition by this case 92060328.

A result of the survey from December 2009 to 2010 Spring showed no ® mark, **LOVE IS FOREVER**, was more acceptable than with ® mark, **LOVE IS FOREVER ®**. With ® mark 275 (female 154 male 121) 44.6%, no ® mark 342 (female 188 male 154) 55.4%.

So my mind had been made up for using no ® mark, **LOVE IS FOREVER**.

On or around one of the days at the place, I met the attorney.

Receiving OK of him for my survey, starting conversation, he advised me to attach ® mark **firmly with friend like attitude** confirming my eyes if they showing positive understanding or not.

Noticing my eyes were not positive to attach ® mark, he said he was an attorney and he seemed to want to say, "My words are of truth and reliable because I am an attorney."

His attitude and words gave me the strong impact to my mind that had been tended for no ® mark.

Nodding of a Japanese lady made the impact firm. The nodding was of a modest lady of business lady atmosphere, and I recognized she had escorted him to the place for his job, not for sightseeing.

I have felt she looked like an employee of the Japanese branch or so of a well-established famous etc company of USA, of which USA headquarters asked him to visit Japan to investigate regarding LOVE IS FOREVER ® or so.

His and her high attitude, way of talking, and atmosphere had made me feel in this way. They were friendly, calm and composed.

According to his so highly kind advice, having started to study regarding ® mark, I decide to attach ® mark as LOVE IS FOREVER ®.

Regarding their names etc I do not know due to my survey being of 1 minute or so with 1 or a few questions not asking individual information as personal name etc of answerer.

The highly thankful matter regarding the attorney and the lady is to remain in and beyond my memory.

9. Regarding Certificate of Mailing and Certificate of Service:

In my ANSWER of 92058656 dated and mailed from Japan March 23, 2014 for TTAB, I have used the word, **Mailing**, as Certificate of Mailing.

I would like to keep it as it is due to the word was given by a highly kind lady of TTAB when I made a telephone call for advice for preparing my ANSWER.

Regarding the word, **Service**, as Certificate of Service I have been using since May 03, 2014 according to the words of another highly kind lady of TTAB, and I would like to keep it as it is.

10. Regarding single quotation, ' ' :

It will be used to mention the word(s) inside the mark is/are slightly different from usual meaning.

I. Aspects of This Case:

1. Respect for fame and dignity of people:

I think hypothetically that there seems no sign/tint in the assigned attorney and plaintiff having considered the importance of the fame and dignity of people. If this sort of consideration was done in this case, this case has not happened, I think.

That is, regarding this case, it seems that the people of plaintiff have no consideration for importance of Common Sense and Public Order and Morals, First Come First Served Rule etc and seem to abuse the trademark law, I feel hypothetically.

I do not know which side is the seller and/or buyer in this petition to cancel case and I do not know what kind of business discussions have been done or going on between the assigned attorney and plaintiff.

I think the attorney has a big possibility to become the seller hypothetically. Finding/confirming my trademark on homepage of USPTO etc, he proposing to plaintiff saying "Hello, Sir, how do you feel about this brand, LOVE IS FOREVER ®, interesting?" "Oh wonderful. Who has it?" "If you want, I can prepare to sell it for you. But it is not cheap." "How much?" "US\$○△○□○○○. - by cash." "All right, I will buy it." "Then I will arrange it next year or so. OK?" "!!?? It is a quite a long time to wait. Why it takes such a long time?" "Because ... my and/or your petition to cancel the registration of the mark may, upon payment of the prescribed fee, be filed ... I and you have been damaged and will continue to be damaged if/because the continued existence of such improper Registration stands as a bar to ... and casts a cloud upon our right to enjoy the free and exclusive use thereof in connection with the sale of its goods...." "I have understood. I will wait for a good news from you...."

This conversation/transaction is a hypothetical one of course. But no one can deny

the possibility of the happening of this kind of business transaction, hypothetically, I think.

Selling and buying goods of other/stranger/3rd party without reporting/having the consent of other/stranger/3rd party is no good, which even an infant knows I think. But it might be that the persons related to this case forgetting etc the unwritten law, Common Sense, Public Order and Morals, First Come First Served Rule etc, they have been abusing etc of the law, § 14(15U.S.C. § 1064), I feel hypothetically.

If 100 or more this kind of things happened to a person or an organization, people might say it is a 'disaster,' I feel. To do one crime is a crime, I feel. A selling and buying goods of other/stranger/3rd party without reporting/having the consent of other/stranger/3rd party is no good. 100 sellings and buyings of goods of others/strangers/3rd parties without reporting/having the consents of others/strangers/3rd parties are no good.

2. Defendant being in Wretched Situation, A Good Chance for Plaintiff?:

Defendant/I have been in the wretched situation as attacked by the plaintiff of another case, 92058656. Altogether defendant/I will be or have been attacked by 2 cases, which will be a good chance to the plaintiff of 92060328?

This is the one of the current aspects of this case.

3. Fascination of LOVE IS FOREVER ® :

**LOVE IS FOREVER ®** has fascination but sometimes makes people out of control. So, sometimes it makes people lose power of proper/sane judgment in mind and be mad and/or insane.

And this case might be a case invited by the power of the fascination to make people mad and/or insane, hypothetically I feel.

For people who run accessory items business such as engage rings, earrings, bracelets, necklaces, or the like etc, it seems that this brand **LOVE IS FOREVER ®** is fascinating, I feel. And in rare case some people who run such business, might lose the power to control to be mad and insane in front of the brand, hypothetically I feel.

4. This case is one of the 2 petition to cancel cases:

This case, 92060328, is one of the 2 petition to cancel cases. Another is 92058656. The brief histories are as follows.

- 11/23&24/2008 I did a marketing research on street regarding image of LOVE IS FOREVER ® .
- 05/13/2009 LOVE IS FOREVER ® was applied by defendant/registrant.
- 06/29/2010 LOVE IS FOREVER ® was registered.
- ➔ So registrant/I having been continued to prepare business step by step although encountering Obstruction of Business etc.
- January 2011 I have finished to prepare the draft of the print design for the package for my products.
- 2012 Many legal offices to use LOVE IS FOREVER ® appeared as follows on Internet in order to draw eyes of customers-to-be for their business without OK of Registrant.
- Inputting Souk Manufacturing Inc., my company name, on Google,
- |                      |                            |
|----------------------|----------------------------|
| (1) May 01, 2012     | 405,000 lists appeared,    |
| (2) June 27, 2012    | 1, 540,000 lists appeared, |
| (3) October 18, 2012 | 2, 710,000 lists appeared. |
- 06/03/2013 Plaintiff of 92058656 applied WHEN LOVE IS FOREVER aiming at refusal of WHEN LOVE IS FOREVER due to similarity, hypothetically I have been feeling.
- 09/18/2013 92058656 plaintiff's WHEN LOVE IS FOREVER was refused. And being refused, not trying to overcome the refusal, the plaintiff filed petition to cancel LOVE IS FOREVER ® , it seems in order to receive chance to obtain LOVE IS FOREVER ® as follow.
- 12/21/2013 **Airticket to China booked/reserved to produce products of LOVE IS FOREVER ® in China by defendant.**
- ➔ **Business preparation continued.**
- 02/07/2014 Petition to cancel was applied by plaintiff of 92058656. ←
- OBSTRUCTION OF BUSINESS?**
- 03/14/2014 Airticket to China was cancelled due to the above petition to cancel.
- OBSTRUCTION OF BUSINESS.**
- 05/19/2014 LOVE IS FOREVER was applied by plaintiff of 92060328 aiming at

- ||
- to receive a chance to register after cancellation of  
LOVE IS FOREVER ®?. OBSTRUCTION OF BUSINESS?**
- 08/27/2014** But LOVE IS FOREVER was refused in 3 months or so after the application.
- 11/05/2014** Petition to cancel LOVE IS FOREVER ® was applied by plaintiff of **92060328. OBSTRUCTION OF BUSINESS?**
- 12/05/2014** According to the high spirit of so many highly respectful persons of TTAB, defendant requesting the due date extension, it was granted from 12/16/2014, the original due date, to **02/14/2015**.
- 01/26/2015** **27 Evidences, Defendant's Pretrial Disclosures, for 92058656 were mailed to TTAB** including the assigned attorney of **92058656**.
- 02/14/2015** Time to Answer of defendant after motion for an Extension of Answer. **So, I had to present my ANSWER on or before 02/14/2015 to a post office in Japan.**
- 02/13/2015** I presented my ANSWER to the post office in Yokohama, Japan for TTAB. ➔ Never stop **business preparation**.
- 03/06/2015** Motion to Strike by plaintiff of **92060328** mailed on **03/06/2015** although mentioning that mailed on **03/05/2015** in/on the Certificate of Service. **03/06/2015** is the date of the post office stamp on the envelope. And I have confirmed the arrival of the mail in my mail box **03/14 (Saturday)/2015**.
- 06/12/2015** **Order to amend the ANSWER for this case was mailed.**
- 07/12/2015** **Due date to present the AMENDED ANSWER.**

**5. Abuse of Law?:**

**1) Disregard of ownership of other people?:**

If in this petition to cancel of plaintiff, false petitions are included, this case will be a case to take away the right of ownership of the trademark by means of false petitions.

If so, this case might become a case related to a criminal law concerned or so, hypothetically, I feel. **If so, I would like to recommend for plaintiff to withdraw from this case.**

And this case should be judged in accordance with standpoints of such as Common Sense, Public Order and Morals, First Come First Served Rule

etc too, I do feel so.

2) In order to take away the ownership from the real owner, 2 kinds of methods were prepared respectively, hypothetically I feel. The one is method of 92058656 and the other is of 92060328.

The method of 92058656 is to file/apply similar trademark, WHEN LOVE IS FOREVER, to LOVE IS FOREVER ® and the method of 92060328 is to file/apply the same trademark to LOVE IS FOREVER ®, and both of them being refused.

And now both owners of the marks filed/applied the petition to cancel LOVE IS FOREVER ® .

3) Normal response in application in finding similar trademark registered:

Normally at the stage of finding similar ones, the applicant will do as,

- (1) withdrawing from the initial choice, similar ones,
- (2) creating and/or finding out new choices not similar to the registered ones,
- (3) then applying them for registration, I think. This is normal method, and this is my method, too.
- (4) but the plaintiff, of 92060328, applying the same trademark, LOVE IS FOREVER, and being refused,
- (5) then the plaintiff applied for the petition to cancel, 92060328, aiming at the mark, LOVE IS FOREVER ® if my understanding being correct.

4) Common Sense, Public Order and Morals, First Come First Served Rule etc:

I think, it is a very important article/law that § 14 (15 U.S.C. § 1064), Cancellation.

But they, Common Sense, Public Order and Morals, First Come First Served Rule etc, are equivalently or more important for us not to disregard, I think.

First Come Served Rule must not be forgotten, but forgetting it, the plaintiff has been trying to abuse the cancellation system in order to be ahead etc of the first come, that is, trying to make my possession plaintiff possession, I think hypothetically.

Common Sense, Public Order and Morals, First Come First Served Rule etc

10/31

11/34

should not be disregarded, I feel. If they are disregarded, which will/might damage Common Sense, Public Order and Morals, First Come First Served Rule etc, which might cause quarrels everywhere as in a train etc to fight to get a seat to sit etc etc.

## II. Attitude of Defendant for Business, History of LOVE IS FOREVER etc:

### 1. Marketing research:

The use of the trademarks including LOVE IS FOREVER ®, as business procedure, has been processed respecting for instance from 1) to 5) as I reported as follows.

I respect marketing research in commerce and business. It is a built in procedure in commerce and business, I think. I do not respect to start production and selling without marketing research in advance.

- 1) marketing research for creating ideal image of the trademark etc,
- 2) marketing research for creating ideal products themselves etc,
- 3) marketing research for creating ideal packages etc,
- 4) marketing research for creating ideal advertisement etc,
- 5) marketing research for creating ideal company image etc.

### 2. Application of LOVE IS FOREVER ®:

Respecting First Come First Served Rule, I applied as follows.

Date of filing (application) to Japan Patent Office:	July 01 2008
Date of registration by WIPO:	May 13 2009
Date of registration by Japan Patent Office:	May 15 2009
Date of filing to USPTO:	May 13 2009
Date of registration by USPTO:	June 29 2010

### 3. History of Love is Forever ® etc:

#### 1) 1986:

I had used for the first time LOVE IS FOREVER at my friend, Mr. T, wedding announcement party.

I wrote LOVE IS FOREVER on a Japanese traditional decorative paper which is for writing happy encouraging words, cartoons etc at a farewell

party, wedding party, etc. Often many people getting together will write various messages etc on the paper and give it to a couple to marry or person to leave a company, or move to a new section etc.

The words, LOVE IS FOREVER, came to my mind spontaneously at the party.

February 14, 2014, knowing about the filing of 92058656, as to the writing on the traditional decorative paper, I made a telephone call to Mr. T. His wife taking up my call and she said he died 7 years ago and said she remembers the decorative paper but it was lost away together with his/her house by the big earthquake happened 1995 in Kobe and the vicinity. 6, 434 people died 3 people missing, 43,792 people injured by the earthquake according to Wikipedia of March 18, 2014 on Internet.

2) February 05, 2008:

I/entrepreneur/defendant applied to register current company, Souki Manufacturing Inc. and it was registered on the same day and started as a company operated by defendant only with no other staff, with no beautiful office.

3) The trademark, LOVE IS FOREVER ®, application and registration etc are as follows and as in the above.

Date of filing (application) to Japan Patent Office:	July 01 2008
Date of registration by WIPO:	May 13 2009
Date of registration by Japan Patent Office:	May 15 2009
Date of filing to USPTO:	May 13 2009
Date of registration by USPTO:	June 29 2010

4) November 23 and 24, 2008:

I did a marketing research on street regarding image of LOVE IS FOREVER ®.

5) I had registered the following domain names as candidates for my Internet shop.

love-is-forever.com

January 18, 2010

Soukimfg.com

December 28, 2010

love-is-forever.jp

January 19, 2010

love-is-forever.com etc, we can confirm the registrations by WHOIS.

6) January 2011:

January 2011, I have finished to prepare the draft of the print design for the package for my products.

After creating some ideas for print designs, having the draft in my hands, I having visited in the evening the busiest place of Shinjuku of Tokyo, I did a pilot intercept survey there.

At the survey receiving highly kind advice of the ladies, having a small confidence as to my ideas, I have prepared the print design sample/testee for the real survey to do at the same place mentioned in the above paragraph 8 in NB.

But for certainty, in front of the real intercept survey, I had done a pre-survey in Yokohama.

In the pre-survey, the first answerer, a lady, seeing my design sample, abruptly said, "I would like to buy it..." "???!"

Being astounded, highly politely thankfully I mentioned, "I couldn't..."

She showed the intention to buy the sample for intercept survey.

And I changed to stop my schedule to do the real intercept survey.

The words of her then decided the print design. Since then regarding print design for package for my products, I have done nothing until now.

And the design has been quietly waiting for debut for 4 years and some now in a narrow bookshelf like place of my tiny living house like office.

7) 2012:

**I had noticed on Internet the unwelcome homepages using my trademark, LOVE IS FOREVER ® etc, without OK of me.**

The homepages were of legal offices' ones mainly, that need to visit

often the data base of USPTO, where I think they noticed LOVE IS FOREVER ® .  
**OBSTRUCTION OF BUSINESS to defendant has started from this time around.**

Inputting Souki Manufacturing Inc., my company name, on Google,

- (1) May 01, 2012            405,000 lists appeared,
- (2) June 27, 2012        1, 540,000 lists appeared,
- (3) October 18, 2012    2, 710,000 lists appeared.

I had contacted some companies etc and asked them to refrain from featuring my company name and trademarks. They OKed to refrain showing ladies and gentlemen manner.

**Then the unwelcome homepages started to decrease, which had given me a big respect regarding USA.**

Among the above (1) (2) and (3), I saw a homepage with face photo of the attorney of 92058656, Madam Catherine M.C. Farrelly, but I did not know it was hers then. And I had forgotten about her face photo.

8) February 13, 2014:

The highly kind e-mail of the attorney in Michigan has arrived, which I noticed February 14. It informed about the cancellation trial, 92058656, precisely.

9) 2012 around:

Madam Catherine M.C. Farrelly of 92058656, she must have noticed about LOVE IS FOREVER ® according to situation.

The attorney of 92060328 might have started to notice about my LOVE IS FOREVER ® at USPTO data base, I feel/think.

10) December 05, 2012:

IRS for the first time started to give me an e-mail regarding taxation matter, 2013 they giving, January 16, 2014 they gave me an e-mail.

But I having had no income in USA yet, I have not responded until now.

11) June 03, 2013:

If it is correct, on the above date, the trademark of the plaintiff of 92058656 case, WHEN LOVE IS FOREVER, was applied.

12) June 2013:

I had posted my home page for the first time on Internet for safety of good people against the unwelcome home pages of the above (1) (2) (3).

There I mentioned, "Regarding the use of ...LOVE IS FOREVER ®, Souki Manufacturing Inc. has OKed no organization etc ... Souki Manufacturing Inc. has no related/affiliated organizations ...if in case organizations or individual persons etc suffered damages and/or losses etc ...regarding which seems to be good to consult with authorities concerned."

The domain name for the above homepage is [www.soukimfg.com](http://www.soukimfg.com).

13) My time being forced to use for coping with the above unwelcome homepages, due to this struggling, my jobs including preparation of Internet shop etc are **delayed and delayed**.

14) September 18, 2013:

If it is correct, on the above date, the application of the plaintiff of 92058656 trademark, WHEN LOVE IS FOREVER, was refused by USPTO due to the similarity to LOVE IS FOREVER ®.

15) December 2013:

I had almost finished preparation of Internet shop homepage.

16) December 21, 2013:

I had booked/reserved airticket to Shanghai leaving Tokyo March 16, 2014 staying in China until March 29, 2014.

This visit was for my business to produce etc my products.

I have visited so many times to China to prepare/confirm suppliers to ask my products to prepare.

17) February 07, 2014:

If it is correct, on the above date, the plaintiff, of 92058656, applied the cancellation petition.

The commencement of the one of the 2 **OBSTRUCTIONs OF BUSINESS**, 92058656 and 92060328, to me/defendant.

The plaintiff selected no creative invention of another or new trademarks method **without responding the refusal of the WHEN LOVE IS FOREVER**, according to the information I have now.

I can use my small creativity for a new trademark etc, I feel.

18) February 11, 2014:

Notice of application for cancellation trial issued.

But I did not know about the petition to cancel case then.

19) February 13, 2014:

The very kind e-mail was arrived from the legal office in Michigan informing regarding this cancellation trial, 92058656, which I noticed February 14, 2014.

20) February 14, 2014:

Looking at the face photo of Madam Catherine M.C. Farrelly of her office homepage, I have noticed she is the same person who was on a homepage among the many unwelcome homepages appeared 2012 on Internet.

I printed her office homepage February 28, 2014.

21) March 01, 2014:

I made a phone call to Madam Catherine M.C. Farrelly, the assigned attorney for the plaintiff of 92058656 and recommended her to withdraw from this cancellation case.

But she did not show intention to withdraw then.

22) March 06/12, 2014:

Postponement to visit China for production etc.

**OBSTRUCTION OF BUSINESS** in the wretched situation by the 92058656

case.

I sent an e-mail March 06 and March 12 to my friend in Shanghai regarding possibility of postponing of my visit to China from March 16.

23) March 14, 2014:

I had cancelled the airticket leaving Tokyo March 16 coming back to Japan March 29, 2014.

24) March 20, 2014:

Example of the transaction regarding 92058656.

Because feeling uncertainty regarding Madam Catherine M.C. Farrelly, thinking it might be good to send a copy of my ANSWER then preparing directly to plaintiff, I made a telephone call to Samuel Aaron's phone number, 718-392-5454, I saw on the homepage, [www. the-aaron-group.com/](http://www.the-aaron-group.com/), etc, early morning March 20 Japan time.

A lady taking up the phone, and giving me a fax number different from the one, 7813-786-2748, I can see on the homepage, and said she could handle the document from me accordingly.

But she did not give the name of the president of the company etc according to my request.

Feeling uncertainty, I confirmed the homepage of Samuel Aaron, Inc. But there I could not find the name of the president, etc which I saw on the same homepage or the like page or so a few days ago. And it had disappeared that another homepage featuring scenes of timbering, loading, carrying, cargo vessel, the name of Samuel Aaron, etc, according to my memory, although the memory was not precise.

The above gave me feeling of uncertainty about Samuel Aaron, Inc.

25) May 19, 2014:

The commencement of the **2nd OBSTRUCTION OF BUSINESS, 92060328,**

to me, I feel. To me, an amateur as to legal matter, it is to be the commencement of 'THE 2ND DISASTER.'

The attorney of trademark pro, Mr. Milord A. Keshishian, has filed the LOVE IS FOREVER which is same to the LOVE IS FOREVER ® of defendant.

**26) August 27, 2014:**

The LOVE IS FOREVER applied by the plaintiff of 92060328 was refused in 3 months or so, after the application, which might have been too early for the plaintiff expectation.

The plaintiff might have expected my LOVE IS FOREVER ® cancellation before August 27, 2014 due to the petition to cancel my LOVE IS FOREVER ® has been filed since February 07, 2014 by another plaintiff of 92058656. If my LOVE IS FOREVER ® was cancelled before August 26 or so, LOVE IS FOREVER of plaintiff of 92060328 might have been registered, I think, if my supposition is in accordance with the law etc concerned.

**27) November 05, 2014:**

The petition of cancellation of the plaintiff, 92060328, was applied. December 16, 2014 was the due date to answer regarding 92060328.

**28) December 04, 2014:**

Regarding this case, 92060328, according to so many highly kind advice of highly efficient persons of TTAB including the lady's highly kind advice, I having contacted by telephone with the attorney, Mr. MILORD A. KESHISHIAN, of/for plaintiff, I asked his consent for my request to extend the time to answer.

It might be that it was the request of me who know the facts, it might have been difficult for him to say NO or so. He was very kindly OKed for my request.

I explained to him as to misfortune of one of my family, I have to take care etc, and being busy, too, which might have made him difficult to say NO, too, I feel now.

**29) December 05, 2014:**

Regarding this case, 92060328, I filed consent motion to extend and it was highly

kindly respectfully granted.

30) January 26, 2015:

**27 Evidences, Defendant's Pretrial Disclosures, for 92058656 were mailed to TTAB including the assigned attorney of plaintiff.**

31) February 14, 2015:

The above date is the extended due date of my answer for 92060328, which was given by/through the high spirit of so many highly respectful people of TTAB etc, I feel.

February 13, 2015, I have presented my ANSWER to/at the post office in Yokohama, Japan.

32) March 06, 2015:

The Motion to Strike by plaintiff of 92060328 was mailed on **March 06, 2015** according to the stamped date on the envelope where the document of the Motion to Strike was enclosed, although the certificate of service prepared by plaintiff said/mentioned, **"I HEREBY CERTIFY that, on March 5, 2015, I caused a true and correct copy of the foregoing MOTION TO STRIKE sent via First Class International Mail, postage prepaid, to Registrant's Correspondence of Record as follows:"**

33) June 12, 2015:

**The Order to amend the ANSWER for this case, 92060328, was mailed.**

34) July 12, 2015:

The above date is the due date to mail, to present to a post office in Japan in case of mailing, the **AMENDED ANSWER** for TTAB, I think.

4. Preparation of Business: Purchasing Softwares, Camera to Prepare Internet Shop:

Being encountering the OBSTRUCTIONS in the wretched situation, defendant has been continuing to prepare its business step by step.

1) January 11, 2009:

I purchased ADOBE Illustrator CS4 for making top page etc of my Internet

shop and have started to learn how to use it by myself.

2) December 17, 2010:

I purchased Homepage Builder 15, an easy to build homepage kit.

3) January 17, 2013:

I purchased "da Vinci Cart," an easy to set shopping cart kit for the Internet shop.

4) February 22, 2014:

According to schedule I purchased a camera, OLYMPUS, for taking photos for the top page etc. February 22, I have changed OLYMPUS to Canon's at the store I purchased OLYMPUS having the kindness of the store.

In the ANSWER dated/mailed/presented for TTAB March 23, 2014 for 92058656 and in the Complete Version of Amended ANSWER dated/mailed/presented for TTAB December 30, 2014 for 92058656, the date changed OLYMPUS to Canon's being written February 20, 2014, in this ANSWER I will make/amend it to February 22, 2014 as in the above according to the date of receipt for Canon's.

**III. Denial and Grounds of Defendant to deny Petition of Plaintiff:**

Defendant will fully deny this cancellation petition of plaintiff as follows.

And if you, Mr. Milord A. Keshishian, could kindly/respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS etc, it is highly respectfully thankful.

And this case, 92060328, being reported/petitioned as in the above etc, I would like to return this petition to cancel to plaintiff, but for certainty, I will confirm to deny etc as follows regarding each ground alleged.

1. Regarding "1. On May 13, 2009, Respondent filed an application to register the

trademark LOVE IS FOREVER on the Principal Register for use in connection with “key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks,” in International Class 014. The Registration was issued under Section 66 (a) of the United States Trademark Act.”

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 1. I hope the goods are same to the goods registered by USPTO.

But I do not have sufficient knowledge/information to form a belief as to the intentions that the assigned attorney has intended by the words in the above paragraph 1, therefore I will deny the intentions in the above paragraph 1.

And if the intentions intended by the words in the above paragraph 1 is socially unwelcome intentions etc, the intentions intended by the words in the above paragraph 1 should be denied and withdrawn, I feel.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

2. Regarding “2. To the best of Petitioner's knowledge, the name and address of the current owner of the Registered Mark is: SOUKI MANUFACTURING, INC., 326-6 SAKAMOTO-CHO, HODOGAYA-KU, KANAGAWA, 240-0043, JAPAN, email: mina-csj@nifty.com.”

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 2.

But I do not have sufficient knowledge/information to form a belief as to the intentions that the assigned attorney has intended by the words in the above paragraph 2, therefore I will deny the intentions in the above paragraph 2.

And if the intentions intended by the words in the above paragraph 2 is socially unwelcome intentions etc, the intentions intended by the words in the above paragraph 2 should be denied and withdrawn, I feel.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

3. Regarding "3. On May 19, 2014, Petitioner filed a Use Based application to register the trademark LOVE IS FOREVER on the Principal Register, Serial No. 86/285,762, for use in connection with bracelets, earrings, jewelry, necklaces, pendants, rings, and women's jewelry, in International Class 014."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 3.

But I do not have sufficient knowledge/information to form a belief as to the intentions that the assigned attorney has intended by the words in the above paragraph 3, therefore I will deny the intentions in the above paragraph 3.

And if the intentions intended by the words in the above paragraph 3 is socially unwelcome intentions etc, the intentions intended by the words in the above paragraph 3 should be denied and withdrawn, I feel.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up

the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

4. Regarding "4. Petitioner has invested a great deal of time, money and effort in promoting Petitioner's business and the professional quality of its goods, and continues to spend substantial amounts of time and money in the promotion of the same."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 4.

But I will deny the above paragraph 4 alleged by plaintiff as follows.

Because the above words in the above paragraph 4 seem to be irrellebant to the issues/merits of this case. That is, one of the issues/merits is OBSTRUCTION OF BUSINESS including PRIVACY, I think.

And regarding the allegations of the assigned attorney etc in the paragraph 4 in the above, it seems to be the consequent of the blunder/mistake of the assigned attorney etc

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

5. Regarding "5. Upon information and belief, Registrant has either never used the Registered Mark in commerce, or completely ceased using the Registered Mark,

in connection with the goods identified in the Registration, for a period of at least three consecutive years.”

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 5.

But the above allegations of paragraph 5 of plaintiff are not precise to the truth etc and inappropriate, therefore I would like to deny the above paragraph 5 alleged by the assigned attorney as follows.

Because I have been continuing to prepare the business of the products of the trademark, LOVE IS FOREVER ® from before the registration as a tortoise step by step in spite of the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc by the assigned attorney.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

6. Regarding “6. Petitioner has been damaged and will continue to be damaged if the Registered Mark is permitted to remain on the Principal Register because the Registered Mark stands as a bar to Petitioner’s ability to federally register and protect its LOVE IS FOREVER mark for the goods identified above.”

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 6.

But I will deny the above paragraph 6 alleged by plaintiff as follows.

Because regarding the allegations of the assigned attorney etc in the paragraph 6 in the above, it seems to be the consequent of the blunder/mistake of the assigned

attorney etc

And the above words of the assigned attorney in paragraph 6 are irrelevant to the merits/issues of this case. One of the issues/merits etc of this case is to be OBSTRUCTION OF BUSINESS and PRIVACY etc, I think.

And mentioning irrelevant things, approaching and accessing to me and filing of this case by the assigned attorney, Mr. Milord A. Keshishian, are heavy OBSTRUCTION OF BUSINESS and PRIVACY etc.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

7. Regarding "7. Upon information and belief, Registrant does not sell goods under the mark on its website in connection with the claimed goods. Registrant's website <soukimfg.com>, where the goods claimed in the Registration would likely be found, has no mention whatsoever of the goods or where the goods can be purchased."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 7.

But the above allegations of paragraph 7 of plaintiff are not precise to the truth etc and inappropriate, therefore I would like to deny the above paragraph 7 alleged by the assigned attorney as follows.

Regarding the domain name, soukimfg.com, I have been considering to use it for other than Internet shop according to the following surveys etc.

Regarding the survey for Internet shop etc, purchasing/registering 15 domain

names, including **soukimfg.com** in the 15 domain names, regarding such as LIKE DISLIKE etc of the 15 domain names, I have done during the period from 03/05/2011 to 10/14/2012 by myself at the same place mentioned in the foregoing paragraph 8 of NB. The number of survey for domain names per survey, 1stly it was 15. But it had been reduced to select top choices.

Regarding **soukimfg.com**, one of the results of the surveys done during the above period has recommended to use it for other than Internet shop.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

8. Regarding "8. Upon information and belief, Registrant has either never actively used the mark in question, or has permanently ceased all use of the Registered Mark in connection with "key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks," with no intention to resume use of the Registered mark."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 8.

But the above allegations of paragraph 8 of plaintiff are not precise to the truth etc and inappropriate, therefore I would like to deny the above paragraph 8 alleged by the assigned attorney as follows.

Because I have been continuing to prepare the business of the products of the

trademark, LOVE IS FOREVER ® from before the registration as a tortoise step by step in spite of the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc by the assigned attorney.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

9. Regarding "9. Upon information and belief, by reason of the facts set forth above, and that the Registrant has failed to use the mark for at least three consecutive years, Registrant had abandoned the Registered Mark within the meaning of 15 U.S.C. § § 1064 (3) 1127."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 9.

But the above allegations of paragraph 9 of plaintiff are not precise to the truth etc and inappropriate, therefore I would like to deny the above paragraph 9 alleged by the assigned attorney as follows.

Because I have been continuing to prepare the business of the products of the trademark, LOVE IS FOREVER ® from before the registration as a tortoise step by step in spite of the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc by the assigned attorney.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

10. Regarding "10. By virtue of the foregoing, if the Registered Mark is permitted to remain on the Principal Register with all the rights and privileges conferred on it by its status as a Principal Registration, Petitioner will be damaged, including its inability to secure a registration for its LOVE IS FOREVER mark, and Registrant will enjoy unlawful gain and advantage to which it is not entitled under the Lanham Act 15 U.S.C. § § 1051, et seq."

**Response:** I have noted the allegations mentioned by plaintiff in the above paragraph 10.

But the above allegations of paragraph 10 of plaintiff are inappropriate, therefore I would like to deny the above paragraph 10 alleged by the assigned attorney as follows.

Because the trademark was registered June 29, 2010 after the following procedures: (1) the highly respectful, scientific, persuasive and lawful examinations of the highly respectful, scientific, persuasive and lawful examining attorneys, and then (2) publication in public for opposition, including for the assigned attorney and plaintiff, I think.

Regarding the allegations of damaged or so alleged by the assigned attorney etc in the paragraph 10 in the above, it seems to be the consequent of the blunder/mistake of the assigned attorney etc.

And the trademark, LOVE IS FOREVER ®, has fascination to the people in the business handling the goods of International Class 014 such as accessories, as necklaces, pendants, bracelets, etc etc, and in rare cases, the people in the business handling the goods might lose sane power of control in mind in front of the goods of the fascinating trademark, LOVE IS FOREVER ®, I think.

And it might be that the assigned attorney etc might have been 'cooperative' in front of the trademark, LOVE IS FOREVER ®, with power to make people insane....

And he should have made a phonecall to me in advance or visited me like such as the wonderful attorney who visiting me and recommended to attach ® mark.

But he, Mr. Milord A. Keshishian, did not.

And I have never abandoned and will never abandon the registered trademark, LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up the business of the trademark step by step as a tortoise for wonderful-customers-to-be although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

11. Regarding CONCLUSION,

“11. Petitioner is damaged and will continue to be damaged because the continued existence of such improper Registration stands as a bar to Petitioner's ability to federally register its LOVE IS FOREVER mark, and casts a cloud upon Petitioner's right to enjoy the free and exclusive use thereof in connection with the sale of its goods.”

**Response:** The allegations of the paragraph 11 in the above, it is the consequent of the assigned attorney's blunder/mistake, therefore I will deny the allegations of the paragraph 11 in the above.

And the above words of the assigned attorney in paragarph 11 are irrelevant to the merits/issues of this case. One of the issues/merits etc of this case is to be OBSTRUCTION OF BUSINESS and PRIVACY etc, I think.

And mentioning irrelevant things, approaching and accessing to me and filing of

---

1: I have added a in/on the above although have not typewritten in/on the same place of ANSWER mailed for TTAB and plainiff 02/13/2015. And if it could be regarded this amendment as the amendment for the place of ANSWER mailed for TTAB, I am highly happy.

||  
this case by the assigned attorney, Mr. Milord A. Keshishian, are heavy  
OBSTRUCTION OF BUSINESS and PRIVCY etc.

And I have never abandoned and will never abandon the registered trademark,  
LOVE IS FOREVER ®, by all means, and will continue to prepare/bring up  
the business of the trademark step by step as a tortoise for wonderful-customers-to-be  
although being delayed and delayed due to the heavy OBSTRUCTION OF BUSINESS  
including PRIVACY etc.

Mr. Milord A. Keshishian, it is highly recommendable for you to respectfully  
withdraw from this petition to cancel, OBSTRUCTION OF MY BUSINESS, etc.

12. Regarding CONCLUSION,

“12. WHEREFORE, Petitioner respectfully requests that this Petition be  
granted and that Registration No.3,811, 074 be cancelled pursuant to  
15 U.S.C. §1064.”

**Response:** It seems to be that the above requests for/to  
Trademark Trial and Appeal Board are uncommendable and inappropriate, therefore I  
will deny, not allow.

Because it seems that the foregoing all allegations in paragraph 1 ~ 11 of/by  
plaintiff are based on inappropriatenesses. LOVE IS FOREVER ® has fascination  
but sometimes makes people out of control.

Regarding this case, that is, the petition to cancel the registration of my trademark,  
LOVE IS FOREVER ®, by plaintiff, due to the facts/reasons etc being as  
petitioned and reported as in the above, I sincerely petition the high judgment of  
Trademark Trial and Appeal Board.

Very truly sincerely yours,

*N. Minski*

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

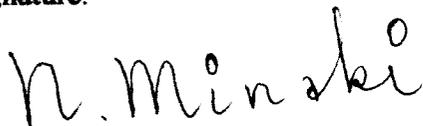
I hereby certify that:

- 1) a true and complete copy of the AMENDED ANSWER as attached have been served on MR. MILORD A. KESHISHIAN, Assigned Attorney for plaintiff, MILORD & ASSOCIATES, PC
- 2) by mailing on July 10, 2015 via First Class Mail, EMS (Tracking No.:EJ358408383JP), service of Japan Post, postage prepaid to:
- 3) MR. MILORD A. KESHISHIAN  
MILORD & ASSOCIATES, PC 2049 CENTURY PARK EAST, SUITE 3850 LOS ANGELES, CA 90067, USA

Attached : 1) AMENDED ANSWER: 31 pages  
2) Receipt of Japan Post: 1 page

Date: July 11, 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

