

ESTTA Tracking number: **ESTTA696110**

Filing date: **09/16/2015**

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	09/16/2015
Attachments	CCF20150916.pdf(1289311 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 Entrepreneur, Trademark Creator, Owner, User

September 16, 2015

Ref number: Souki 150905

MADAM MARY CATHERINE FAINT
INTERLOCUTORY ATTORNEY

Dear Madam,

**Second Time Petitionary Request to Receive Order of You and Your Office
Regarding Pages of my Documents to Report/Respond etc**

1) This is 2nd time request after requesting same request 04/07/2015, ESTTA Tracking number: ESTTA665387.

I would like to express my Deep Thankfulness for the High Judgment of you and your office for my 1st request of 04/07/2015, ESTTA Tracking number: ESTTA665387 regarding if my answer should be made within 25 pages etc. And I had not responded to make it shorter etc.

I think it is the most important matter to have high understanding of you and TTAB in the case of 92060328. So my reports/responses have been tending to be of many pages. And the pages of my this time concerned document has become 38 to 39 pages losing the memory regarding of ESTTA Tracking number:ESTTA665387, and the assigned attorney stating it is too long mentioning as "*Saint-Gobain v. Minnesota Mining and Manufacturing Company*, 66 USPQ'2d 1220 (TTAB2005)". Since Respondent's "Opposition" violates the Board's rule regarding page limitation for a brief on motion, it should not be considered. ”

Because I do not have enough information/knowledge etc regarding the above case of *Saint-Gobain v. 3M*, I have been respecting/enjoying/protected/living etc etc in the Right of Freedom to Express as **Love is Forever ®**

If you and your office will order me/defendant to make it, 38 or 39 pages, shorter as less than 25 pages or equal to 25 pages, I will have been happy to obey to make it as less than 25 pages or equal to 25 pages, regarding which I/defendant will be happy to wait for your and your office order.

The words/information of the assigned attorney regarding the pages etc is important but it is the most important that the judgment/order of you and your office.

The reason that I have mentioning as 38 or 39 pages in the above is that because the assigned attorney stating my document being 39 pages etc in his assertions concerned.

I know my case is only one of so many cases you have been handling, it is hesitating to do this request but it is highly happy if you could kindly allow me to do this request.

My 38 pages document concerned title etc, submitted by ESTTA, Tracking number: ESTTA665387, are as follows:

~~~~ 38 pages document concerned title etc ~~~~~

August 23, 2015

Ref No.: Souki 150801

---

1: USPTQ in the former report of ESTTA66587 04/07/2015, I would like to amend it to USPQ. The place of USPTQ is the 2nd line of the page 2/2.

**PETITIONARY MOTION FOR HIGHLY RESPECTFUL TTAB TO IGNORE  
MOTION FOR DEFAULT JUDGMENT AND MOTION TO STRIKE  
FILED BY PLAINTIFF**

**PETITIONARY MOTION FOR HIGHLY RESPECTFUL TTAB TO GIVE  
ORDER FOR PLAINTIFF TO RESPECT SCHEDULE SET BY  
HIGHLY RESPECTFUL TTAB**



2) Regarding my responses/answers to the assertions mentioned in the Other Motions/Papers in ESTTA695492 (ESTTA Tracking number) 09/11/2015 (Filing date) by/of plaintiff, I will **DENY** herein too because this case, 92060328, **plaintiff has raised in accordance with the grounds of Not Fact**, as asserting such as I have abandoned my trademark, **Love is Forever ®**, and because plaintiff has been continuing to OBSTRUCT my production of my products concerned in factories in China since I have cancelled economizing discounted airticket to China March 14, 2014 due to 92058656, etc etc.

And if you could allow, my response regarding the assertions of plaintiff filed 09/11/2015 by ESTTA695492, I would like to prepare to present my response later on.

3) Regarding Certificate of Service for this report/response to the assigned attorney for plaintiff, after mailing/receiving receipt of post office of this document etc, I would like to submit to present for you.

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