

ESTTA Tracking number: **ESTTA696406**

Filing date: **09/17/2015**

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	09/17/2015
Attachments	CCF20150917.pdf(3256970 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 17, 2015
Ref number: Souki 150907

MADAM MARY CATHERINE FAINT
INTERLOCUTORY ATTORNEY

Dear Madam,

Presenting Certificate of Service

I would like to submit to present Certificate of Service etc to certify that I mailed to/for the attached documents 1) and 2) as follows to the assigned attorney for plaintiff September 16, 2015.

The attached:

- 1) Report to Madam Mary Catherine Faint, Interlocutory Attorney 3 pages
Ref number Souki 150905 dated September 16, 2015
- 2) Letter for Assigned Attorney 1 page
- 3) Certificate of Service 1 page

4) Receipts of Post Office

2 pages

Very truly sincerely yours,

A handwritten signature in black ink that reads "N. Minaki". The letters are cursive and fluid, with a small circle above the 'i'.

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

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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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 USPQ¹2d 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

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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

September 16, 2015

Ref number: Souki 150906

Mr. Milord A. Keshishian  
Attorney for Plaintiff, L.A. GEM AND JEWELRY DESIGN, INC.  
Milord & Associates, PC

Dear Sir,

I would like to send the attached below to submit to Madam Mary Catherine Faint,  
Interlocutory Attorney.

Attached: Copy of letter for Madam Mary Catherine Faint, Interlocutory Attorney 3 pages

Very truly sincerely yours,

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive, flowing 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  
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) true and complete copies of:

Ref number: Souki 150905 for Madam Mary Catherine Faint,  
Interlocutory Attorney:

3 pages

have been served on MR. MILORD A. KESHISHIAN, Assigned Attorney for plaintiff,  
MILORD & ASSOCIATES, PC

2) by mailing on September 16, 2015 via First Class Mail, EMS (Tracking No.:EG421595147  
JP), 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

Date: September 17, 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

Receipt

|                                                                                                           |  |                                                                                                                                                                                                                        |  |                                                                                                                                                                              |  |
|-----------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>EMS</b> 国際スピード郵便                                                                                       |  | お問い合わせ番号<br>EMS item number                                                                                                                                                                                            |  | <b>EG421595147JP</b>                                                                                                                                                         |  |
| 8 FROM(ご依頼主)                                                                                              |  | 4 受付年月日 Date mailed<br>2015 年 9 月 16 日                                                                                                                                                                                 |  | 17 15:08 時 (Hour) 分 (Minute)                                                                                                                                                 |  |
| Name <b>Nobuhiko Minaki</b>                                                                               |  | TO(お届け先)                                                                                                                                                                                                               |  | 郵便料金 諸料金                                                                                                                                                                     |  |
| Address <b>Souki Manufacturing Inc.<br/>326-6 Sakamoto-cho<br/>Hodogaya-ku, Yokohama-shi<br/>Kanagawa</b> |  | Name <b>Mr. Milord A. Keshishian</b>                                                                                                                                                                                   |  | 合計金額 Postage paid                                                                                                                                                            |  |
| 9 郵便番号<br>Postal code <b>240-0043</b>                                                                     |  | 都市名 City <b>Los Angeles, CA</b>                                                                                                                                                                                        |  | 円 Yen                                                                                                                                                                        |  |
| 7 電話番号 Telephone No. <b>81-45-332-7890</b>                                                                |  | 郵便番号 Postal code <b>90067</b>                                                                                                                                                                                          |  |                                                                                                                                                                              |  |
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| 11 内容品の詳細な記載<br>Detailed description of contents<br><b>Document<br/>Ref#: Souki 150905</b>                |  | 10 内容品の個数<br>Number of items contained<br><b>4 pages</b>                                                                                                                                                               |  | 12 正味重量<br>Net weight<br><b>18</b>                                                                                                                                           |  |
| 13 商業物品のみ記入<br>For commercial items only<br>HSコード 内容品の原産国<br>HS tariff number Country of origin           |  | 14 内容品の価格<br>Value<br><b>¥5.00</b>                                                                                                                                                                                     |  | 11 電話番号 Telephone number                                                                                                                                                     |  |
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| 17 署名 Signature of the sender<br><b>N. Minaki</b>                                                         |  | 18 内容品の種類<br>Type of contents<br><input type="checkbox"/> 贈物 a gift<br><input type="checkbox"/> 商品 merchandise<br><input type="checkbox"/> 身のまわり品 personal effects<br><input checked="" type="checkbox"/> 書類 documents |  | 19 次の場合は <input type="checkbox"/> に <input checked="" type="checkbox"/> をつけてください。<br>Insert a cross (X) if the item contains:<br>商品見本 a sample<br>その他 others<br>書類 documents |  |
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| 8 FROM(ご依頼主)                                                                                                                                                                                                                                                                                     |  | 4 受付年月日 Date mailed<br>2015 年 9 月 16 日            |  | 17 15:08 時 (Hour) 分 (Minute)  |  |
| Name <b>Nobuhiko Minaki</b>                                                                                                                                                                                                                                                                      |  | EMS 受取書 (Sender's Copy)                           |  | 正に受領いたしました。                   |  |
| Address <b>Souki Manufacturing Inc.<br/>326-6 Sakamoto-cho<br/>Hodogaya-ku, Yokohama-shi<br/>Kanagawa</b>                                                                                                                                                                                        |  | ※本受取書は、領収証書ではありません。                               |  |                               |  |
| 9 郵便番号<br>Postal code <b>240-0043</b>                                                                                                                                                                                                                                                            |  | JAPAN                                             |  |                               |  |
| 7 電話番号 Telephone No. <b>81-45-332-7890</b>                                                                                                                                                                                                                                                       |  | USA                                               |  |                               |  |
| FAX番号 Fax No. <b>81-45-515-0047</b>                                                                                                                                                                                                                                                              |  | (日付印 Date Stamp)                                  |  |                               |  |
| 配達状況お問い合わせ (Track & Trace)<br><a href="http://www.post.japanpost.jp">http://www.post.japanpost.jp</a><br>EMSに関するお問い合わせ<br><b>0120-5931-55</b><br>(携帯電話からのお客さま) 0570-046666<br>(Telephone for English) 0570-046111<br>平日 (Mon. to Fri.) 8:00~22:00<br>土・日及び休日 (Sat. Sun. and holidays) 9:00~22:00 |  | HODOGAYA<br>KANAGAWA<br>16. IX. 15-18-24<br>JAPAN |  |                               |  |
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## 領収証書

毎度ありがとうございます

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