

ESTTA Tracking number: **ESTTA700056**

Filing date: **10/05/2015**

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	10/05/2015
Attachments	CCF20151005.pdf(2974311 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

October 05, 2015
Ref No.: Souki 151001

Madam Mary Catherine Faint
Interlocutory Attorney

Dear Madam,

- 1) If it could be allowed, I would like to present **Amendment** (Ref No.: Souki 151002) and the attached.

If you could kindly and appropriately handle, I am highly thankful.

Regarding amendments other than this, if it could be allowed, confirming, I would like to present as soon as possible.

- 2) Regarding your high name, I typewrote/mentioned 2 ways in the past as Madam M. Catherine Faint and Madam Mary Catherine Faint.

From now on I would like to write/mention Madam Mary Catherine Faint. If it is to be inconveniences, if you could kindly advise, I am highly happy.

Attached:

- | | |
|---|---------|
| 1) Amendment (Ref No.: Souki 151002) | 2 pages |
| 2) Amendment by Handwriting | 1 page |
| 3) Amendment by Typewriting | 1 page |
| 4) Certificate of Service | 1 page |
| 5) Receipt of Post Office | 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.

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October 05, 2015
Ref No.: Souki 151002

Amendment

In the following <title> of petitionary requests dated September 26, 2015 Ref No.:Souki 150909, if it could be allowed to amend as follows, I am highly happy.

~~~~~<title>~~~~~

September 26, 2015  
Ref No.: Souki 150909

- 1) PETITIONARY REQUEST FOR HIGHLY RESPECTFUL TTAB TO SUPPORT TO IGNORE MOTION FOR DEFAULT JUDGMENT AND MOTION TO STRIKE FILLED BY PLAINTIFF**
  
- 2) PETITIONARY REQUEST FOR HIGHLY RESPECTFUL TTAB TO SUPPORT MOTION FOR PLAINTIFF TO RESPECT SCHEDULE SET BY HIGHLY RESPECTFUL TTAB**

~~~~~

Amendment:

Place: On the 5th line from the top line of page 16/18.

Before amendment: of Mr. Benjamin Okeke, Interlocutory Attorney,

After amendment: of Mr. Benjamin U. Okeke, Interlocutory Attorney,

For certainty, I would like to attach as follows:

Amendment by Handwriting 1 page

Amendment by Typewriting 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

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and directed to him to the TBMP for additional information. *See* ECF No. 23, pages 3-5. Mr. Okeke further warned Respondent that failure to file and serve an acceptable answer may result in the entry of default judgment against Respondent.

Response to paragraph 5:

For the highly respectful guidance of Mr. Benjamin Okeke, Interlocutory Attorney, I have been so deeply thankful.

U.)

Paragraph 6:

While entry of default judgment is a harsh remedy, such remedy is appropriate in situations like this where a party has repeatedly ignored the TTAB rules and recommendations. Respondent's improper Answers should be stricken and default entered for failing to file and serve an acceptable answer.

Response to paragraph 6:

As I reported in the above "2. The issues/merits" of this document's page 2 to 4, this case is the result of the loss of sanity in morality etc in plaintiff and the assigned attorney side, I think hypothetically.

So, defendant/I will **DENY** the words of plaintiff and the assigned attorney in the paragraph 6.

Defendant/I would like to recommend for plaintiff and the assigned attorney to withdraw from this case.

Paragraph 7:

B. RESPONDENT'S "OPPOSITION" SHOULD BE STRICKEN

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 39 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 USPQ2d 1220 (TTAB 2005). Since Respondent's "Opposition" violates the Board's rule regarding page limitations for a brief on motion, it should not be considered.

Response to paragraph 7:

Regarding the excessive pages matter, which is not intentional, but I have no words.

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 7, therefore I will **DENY** the intentions and words in the paragraph 7.

and directed to him to the TBMP for additional information. See ECF No. 23, pages 3-5. Mr. Okeke further warned Respondent that failure to file and serve an acceptable answer may result in the entry of default judgment against Respondent.

Response to paragraph 5:

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Certificate of Service

I hereby certify that:

1) true and complete copies of:

Amendment	Ref No.: Souki 151002	2 pages
Amendment by Handwriting		1 page
Amendment by Typewriting		1 page

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

- 2) by mailing on October 05, 2015 via EMS (Tracking No.:EG 420511392 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: October 05, 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 of Post Office

EMS 国際スピード郵便		お問い合わせ番号 EMS item number		EG420511392JP	
FROM(ご依頼主)		4 受付年月日 Date mailed 2015/10/05		5 受付時刻 Time mailed	
Name Nobuhiko Minaki		12 TO(お届け先)		郵便料金 諸料金	
Address Souki Manufacturing Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa		Name Mr. Milord A. Keshishian		合計金額 Postage paid	
郵便番号 Postal code 240-0043		都市名 City Los Angeles CA		円 Yen	
7 電話番号 Telephone No. 81-45-332-7890		FAX番号 Fax No. 81-45-515-0047		郵便番号 Postal code 90067	
JAPAN		国名 Country USA		11 電話番号 Telephone number	
21 内容品の詳細な記載 Detailed description of contents		23 内容品の個数 Number of items contained		24 内容品の価格 Value	
Document Souki 151002		6 pages		26 ¥ 7.00	
22 商業物品のみ記入 For commercial items only		25 正味重量 Net weight		FAX番号 Fax number	
HSコード 内容品の原産国 HS Code Country of origin		kg g		27 日本円換算合計(円) Total value	
KAMIHOSIKAWA 240 -5.X.15-12-18 JAPAN				¥7.00 Yen	
39 ご署名 Signature of the sender N. Minaki		40 この郵便物は Number of this pieces 1 番目 Total number of pieces 1 個中		次の場合は <input type="checkbox"/> に X をつけてください。 Insert a cross (X) if the item contains: <input type="checkbox"/> 贈物 gift <input type="checkbox"/> 商品 商品見本 a sample <input type="checkbox"/> merchandise <input type="checkbox"/> 身のまわり品 personal effects <input checked="" type="checkbox"/> 書類 documents <input type="checkbox"/> その他 others	
38 上記内容品は危険物に該当しないことを確認済です。 I checked that contents above are not dangerous goods.		 * E G 4 2 0 5 1 1 3 9 2 J P *			

領収証書

毎度ありがとうございます

様

Receipt of Postage

〒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10月5日 15:20

[別納2]	
EMS第2A	
81,200	81.5g
-----	1通
小計	¥1,200
課税計	¥0
(内消費税等)	¥0
非課税計	¥1,200
△計	¥1,200
□計	
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 仙田 雅子
発行No.1277 端01箱02
連絡先：横浜上星川郵便局
TEL:045-382-1381