

TTAB

November 11, 2014

Ref number: Souki141101

TRADEMARK TRIAL AND APPEAL BOARD

USPTO

Madam Nicole Thier

Dear Madam,

If you could show high kindness to handle the enclosed letter of PETITION FOR SUSPENSION, Ref number: Souki141102 2 pages, it is my great pleasure.

Regarding the format for this petition, I could not find out in the all available forms provided by TTAB/USPTO in website and having advice of the highly kind gentleman of TM specialist of 571-272-8500, telephone number of USPTO advising center, I had prepared the document, for which if you could show your understanding, I am highly happy.

Being encouraged by the word, "If the parties are, or during the pendency of this proceeding become, parties in another Board proceeding or a civil action involving the same or related marks, or involving any issues of law or fact which are also in this proceeding, they shall notify the Board immediately, so the Board can consider whether consolidation and/or suspension of proceedings is appropriate. *See* TBMP § 511."

The word is noted on the 6th page of the 6 pages notice regarding the guidance including the schedule of the CONFERENCE, DISCOVERY, DISCLOSURE AND TRIAL SCHEDULE for 92060328.

Very truly sincerely yours,

N. Minaki

Defendant

Souki Manufacturing Inc.



11-14-2014

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
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 Jewery Design, Inc.

Assigned Attorney

MR. MILORD A KESHISHIAN

MILORD & ASSOCIATES, PC

Cancellation No.: 92060328 filed: November 05, 2014

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Trademark Creator, Owner, User

November 11, 2014

Ref number: Souki141102

TRADEMARK TRIAL AND APPEAL BOARD

Dear Madam/Sir,

PETITION FOR SUSPENSION

Defendant now has been encountering another cancellation case, serial number 92058656, filed February 07, 2014, and I am an entrepreneur and by myself alone has been preparing the business with no employee. And I had planned to produce the products with the mark, LOVE IS FOREVER® in China visiting there March 16 to March 29, 2014, but has been obstructed the visit by the cancellation case, the serial number 92058656 since the filing on February 07, 2014.

It is my great pleasure if customers and customers-to-be will be happy with my products, but now I, defendant, is in the big dangers to be taken away my products with the trademark, LOVE IS FOREVER® in the two cases, 92058656 and 92060328, and in order not to be taken away, I have been forced to be very busy with.

2) How Long to Petition to Suspend etc:

So, regarding the time to ANSWER of the case, 92060328, I would like to petition the high understanding and kindness to suspend for 62 days, that is, from December 16, 2014, the time to ANSWER, to/until/on February 15, 2015.

That is, defendant is to present/hand the ANSWER before/on February 15, 2015 to a post office of Japan for the office of TTAB.

If it is allowed that the above petition, I will be very happy.

Very truly sincerely yours,

N. Minaki

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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Certificate of Service

I hereby certify that a true and complete copy of the foregoing PETITION FOR SUSPENSION has been served on MR. MILORD A KESHISHIAN MILORD & ASSOCIATE, PC by mailing said copy on November 11, 2014 via First Class Mail, EMS, postage prepaid to: MR. MILORD A KESHISHIAN MILORD & ASSOCIATES, PC 2049 CENTURY PARK EAST, SUITE 3850 LOS ANGELES, CA 90067
UNITED STATES

Date: November 11, 2014

Signature: 
Nobuhiko Minaki

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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