

ESTTA Tracking number: **ESTTA718022**

Filing date: **01/04/2016**

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	01/04/2016
Attachments	20160105.pdf(2243610 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

January 05, 2016 Japan Time
Ref No.: Souki 160101

Madam Mary Catherine Faint
Interlocutory Attorney
Trademark Trial and Appeal Board
United States Patent And Trademark Office

Dear Madam,

A Happy New Year

Reply

Thank you very much for your order mailed December 29, 2015.

I have confirmed the reset schedule, which I will respect.

The grounds alleged without evidences or so by plaintiff for cancellation is abandonment of my trademark, LOVE IS FOREVER ®. But I have been continuing to prepare my business for the trademark of LOVE IS FOREVER ® which has been registered, but **I have been obstructed my business, production of my products for the trademark, LOVE IS FOREVER ®, by this allegation alleged and filed since 11/05/2014 by plaintiff, the plaintiff or the attorney.**

I must re-visit China as soon as possible in order to produce my products of the trademark, LOVE IS FOREVER ® , and my friends for the production etc in China have been waiting for my re-visit.

The allegation of my abandonment is not true, accordingly which means the plaintiff seems to have tried to obtain my trademark by telling not-fact/true to TTAB. This action/behavior is antisocial, in which way I have been felt.

I must use my time and small capital money etc to produce my products/commodities for my business.

IRS has been asking me by E-mail repeatedly regarding taxation, and I have been replying such as that I having no income yet in USA but starting to have income, I will report voluntarily and will pay tax.

So, the allegation/request of plaintiff should be discharged in order to maintain its high reliability/dignity/honor of TTAB, and prosperity and tranquility of this world.

- 1) Regarding the high words in your order, my answer is too long and it may not exceed 25 pages and a reply brief may not exceed 10 pages, of which words I have respectfully/reverently confirmed. From now on I would like to do so according to your words.
- 2) I am a Japanese and the mother tongue is Japanese and I do not use English in daily life, so my English is not good and so poor, but I would like to try to do good communication and understanding in this case, 92060328, regarding which if you could kindly/respectfully show high understanding, I am highly/respectfully happy.
- 3) **If petitioner's/plaintiff's motions to strike and default are denied and not to be allowed, I am so highly/respectfully thankful.**

4) According to your order, I would like to make phone call to you, 571-272-9274, before 01/09/2016.

5) Regarding to hold a discovery conference with Board participation on or before January 23, 2016, I do not have enough information as to how it will be conducted etc, if high guidance/explanation regarding the discovery conference could be given to me when I making a phone call to, 571-272-9274, before 01/09/2016, I am highly/respectfully happy.

And I am a Pro Se, and I do not have sufficient experience in discovery conference, **and I have presented 27 evidences of me to TTAB for case of 92058656**, and so I am not certain I should participate in discovery conference or not, regarding which if you could give me your thought on the day/occasion making a phone call to you before 01/09/2015, I am highly happy. The grounds of the cancellation case of **92058656 is abandonment too, which is same to/as the grounds of this case. So there are evidences workable for this case among the 27 evidences, I think.**

If I will find etc new evidences in front of the occasion/schedule of the Defendant's Pretrial Disclosures Due, 11/03/2016, I am happy to add the new evidences.

6) Regarding Adopting Legal Representation, although defendant/I am Pro Se, I am a small entrepreneur with not enough money/capital, and I must keep money for production of products/commodities to sell, and if adopting paying the fee/money for Legal Representation, defendant will be in situation with no money to produce my commodities/products to sell.

So at present, I must be powerlessly a Pro Se.

In future if I am well prepared to adopt Legal Representation, I would like to ask help of wonderful Legal Representation as a matter of course.

7) Regarding my E-mail address, mina-csj@nifty.com, I have been using, I could use it and it is no problem/objection to use electronic communication service in this case Board proceedings.

Regarding to have/seek written agreement from adverse party to service by electronic transmission, thank very much for your highly kind advice

8) Using English in conducting Board proceedings is no objection.

9) Regarding evidences for this case, if new appropriate evidences are to be found, I would like

to present in front of the schedule of the Defendant's Pretrial Disclosures Due, 11/03/2016, and I would like to use appropriate evidences among/from the 27 evidences presented/mailed for the case 92058656 01/26/2015 at/to the post office in Yokohama, Japan, for Trademark Trial and Appeal Board.

Sincerely yours,



Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Entrepreneur, 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

Attached:	Certificate of Service	1 page
	Receipt of Japan Post	1 page

Certificate of Service

I hereby certify that:

- 1) a true and complete copy of the answer for Madam Mary Catherine Faint, Interlocutory Attorney, has been served on MR. MILORD A. KESHISHIAN, Assigned Attorney for plaintiff, MILORD & ASSOCIATES, PC
- 2) by mailing on January 05, 2016 via First Class Mail, EMS (Tracking No.:EG370592691JP), 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 : Receipts of Japan Post:

1 page

Date: January 05, 2016

Signature:



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 E-mail: mina-csj@nifty.com

Receipt for Postal Mailing (Japan Post Receipt)

EMS 国際スピード郵便		③ お問い合わせ番号 EMS item number		EG370592691JP	
⑧ FROM(ご依頼主)		④ 受付年月日 Date mailed 年 Year 月 Month 日 Date		⑤ 受付時刻 時 Hour 分 Minute	
Name Nobuhiko Minaki		2016 1 5		郵便料金 諸料金	
Address Souki Manufacturing Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa		⑫ TO(お届け先)		合計金額 Postage paid	
郵便番号 Postal code 240-0043		Name Mr. Milord A. Keshishian		総重量 Total gross weight	
JAPAN		Address Milord & Associates, PC 2049 Century Park East, Suite 3850		⑩ 都市名 City Los Angeles CA	
⑦ 電話番号 Telephone No. 81-45-332-1890		FAX番号 Fax No. 81-45-515-0047		郵便番号 Postal code 90067	
② 内容品の詳細な記載 Detailed description of contents		⑬ 内容品の個数 Number of items contained		⑪ 電話番号 Telephone number	
Paper documents (Souki 160101) (Souki 160102)		⑭ 正味重量 Net weight		⑬ 内容品の価格 Value	
⑨ 郵便番号 Postal code		⑮ 内容品の種類 For commercial items only		FAX番号 Fax number	
⑥ 電話番号 Telephone No.		⑯ 内容品の原産国 Country of origin		⑬ 内容品の価格 Value	
JAPAN		USA		⑬ 内容品の価格 Value	
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81-45-332-1890		5 pages with 1 envelope		26 ¥7.00	
⑧ FROM(ご依頼主)		⑱ 内容品の種類 For commercial items only		⑬ 内容品の価格 Value	
Name		⑲ 内容品の種類 For commercial items only		⑬ 内容品の価格 Value	
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n. Minaki		⑲ 内容品の種類 For commercial items only		⑬ 内容品の価格 Value	
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領収証書 (Japan Post Receipt)

毎度ありがとうございます

様

〒100-8798 日本郵便株式会社
東京都千代田区霞が関1-3-2
2016年 1月 5日 0:52

[別納2]
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