

ESTTA Tracking number: **ESTTA768664**

Filing date: **09/05/2016**

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	09/05/2016
Attachments	CCF20160906.pdf(1279194 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 (Family Name) (Mr.) Representative Director Trademark Creator, Owner, User

September 06, 2016 JST  
Ref No.: Souki 160904

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

Dear Madam,

If you could allow me to amend as follows in the document of Ref No.: Souki 160902 dated and presented 09/01/2016 JST to Madam Mary Catherine Faint, Interlocutory Attorney, and if you could allow me to present the/a page of Before amendment and the/a page of After amendment as attached, I am highly respectfully happy:

- 1) Place of amendment: 4th line from the 1st line
- 2) Page: 2nd page of the document of Ref No.: Souki 160902 presented to Madam Mary Catherine Faint, Interlocutory Attorney, 09/01/2016 JST.
- 3) Content of amendment: addition of: of Defendant

Before amendment:

Motion to request Respectful Judgment to dismiss Motion to Compel  
Discovery filed 08/25/2016 by Plaintiff

After amendment:

Motion of Defendant to request Respectful Judgment to dismiss Motion to Compel  
↑ Discovery filed 08/25/2016 by Plaintiff

- 4) Reason to add of Defendant : 1) Because the document is very important because it is the document I have presented to Madam Mary Catherine Faint, Interlocutory Attorney.  
2) Because the documents concerned mentioned in the document of Ref No.: Souki 160901 and in the document of Ref No.: Souki 160902 are same. So adding of Defendant as described as in After amendment in the above, I would like to make them one same title name.

Then, communication will become smooth, I think.

NB: I would like to refrain from serving Certificate of Service to you, because I have not served this Ref No.: Souki 160904 to Mr. Milord A. Keshishian, Assigned Attorney.

But if it is necessary for me to serve this Ref No.: Souki 160904 to him and if you would ask me to serve Certificate of Service to you, I am happy to wait for your order and happy to serve Certificate of Service for you.

Attached : Page of Before amendment 1 page  
Page of After amendment 1 page

Very truly sincerely yours and I hope every good day will become happy to visit you,



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

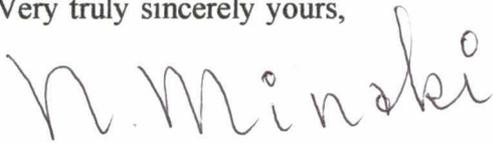
FAX 81-45-515-0047 E-MAIL mina-csj@nifty.com

If you could kindly respectfully handle my Motion accordingly, I am highly respectfully thankful.

Documents presented: *of Defendant*

- 1) Motion to request Respectful Judgment to dismiss Motion to Compel Discovery filed 08/25/2016 by Plaintiff 7 pages
- 2) Documents show Service done to Assigned Attorney for Plaintiff:
  - (1) Certificate of Service 1 page
  - (2) Receipt of Japan Post 1 page

Very truly sincerely yours,



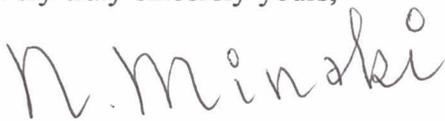
Defendant  
Souki Manufacturing Inc.  
Nobuhiko Minaki (Mr.)  
Representative Director  
Trademark Creator, Owner, User  
326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi  
Kanagawa, 240-0043, Japan  
TEL 81-45-333-4525 81-45-332-7890 direct  
FAX 81-45-515-0047 E-MAIL mina-csj@nifty.com

If you could kindly respectfully handle my Motion accordingly, I am highly respectfully thankful.

Documents presented:

- 1) Motion of Defendant to request Respectful Judgment to dismiss Motion to Compel Discovery filed 08/25/2016 by Plaintiff 7 pages
- 2) Documents show Service done to Assigned Attorney for Plaintiff:
  - (1) Certificate of Service 1 page
  - (2) Receipt of Japan Post 1 page

Very truly sincerely yours,



Defendant  
Souki Manufacturing Inc.  
Nobuhiko Minaki (Mr.)  
Representative Director  
Trademark Creator, Owner, User  
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