

ESTTA Tracking number: **ESTTA775522**

Filing date: **10/08/2016**

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	10/07/2016
Attachments	CCF20161008.pdf(2636940 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  
Application Date of Japan Patent Office: July 01, 2008  
Registration Date of WIPO: May 13, 2009  
Registration Date of Japan Patent Office: May 15, 2009

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

October 07, 2016 JST  
Ref No: Souki 161004

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

Dear Madam,

Amendments

If it could be allowed for me to amend in Petitionary Motions, Ref No: Souki 161001 mailed October 01, 2016 JST, as follows, which if you could appropriately handle, I am highly respectfully thankful.

And the amendments are, I think, very germane to the motions filed by Plaintiff 08/25/2016 and filed by Defendant 09/01/2016 and 10/06/2016 etc.

So if you could highly respectfully handle accordingly my Amendments including my motions

filed 09/01/2016 and 10/06/2016 etc, I am highly respectfully thankful.

I would like to amend Motion to **REPLY MEMORANDUM IN SUPPORT OF MOTION** as follows:

Amendment 1:

Place: 6th line from last line of page 1/9

Before amendment: Plaintiff's Motion arrived to me 09/24/2016 JST by E-mail

After amendment: Plaintiff's **REPLY MEMORANDUM IN SUPPORT OF MOTION** arrived to me 09/24/2016 JST by E-mail

Amendment 2:

Place: 3rd line from last line of page 1/9

Before amendment: ...Plaintiff's Motion filed 09/23/2016 which is EST

After amendment: ...Plaintiff's **REPLY MEMORANDUM IN SUPPORT OF MOTION** filed 09/23/2016 which is EST

Amendment 3:

Place: Last line of page 1/9

Before amendment: The Motion of Plaintiff is ....

After amendment: The **REPLY MEMORANDUM IN SUPPORT OF MOTION** of Plaintiff is ....

Amendment 4:

Place: 1st line of page 5/9

Before amendment: ...Plaintiff's Motion filed 09/23/2016.

After amendment: ...Plaintiff's **REPLY MEMORANDUM IN SUPPORT OF MOTION** filed 09/23/2016.

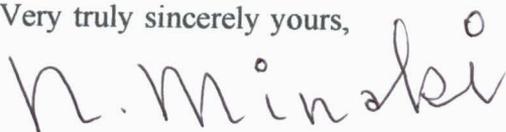
I would like to attach Before amendments and After amendments as follows.

Attached:

- 1) Before amendment 1, 2 and 3: 1 page
- 2) After amendment 1 and 2: 1 page
- 3) After amendment 3: 1 page
- 4) Before amendment 4: 1 page
- 5) After amendment 4: 1 page

Due to increasing of words, such as amendment from Motion, 1 word, to 6 words, **REPLY MEMORANDUM IN SUPPORT OF MOTION**, the positions of words in page 5/9 etc have been changed in After amendment a bit from position of Before amendmnet.

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

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Plaintiff Trademark: LOVE IS FOREVER  
Serial Number: 86285762  
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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

October 01, 2016 JST  
Ref No: Souki 161001

Trademark Trial and Appeal Board  
United States Patent and Trademark Office

Dear Mesdames/Sirs,

Petitionary Motion to Request Respectful Judgment to Dismiss This Case, 92060328, filed by Plaintiff 11/05/2014, and

Petitionary Motion to Petition Permission for me Not to Respond to the Request of Plaintiff's ~~Motion~~ arrived to me 09/24/2016 JST by E-mail

Before amendment 1: REPLY MEMORANDUM IN SUPPORT OF MOTION

I would like to respectfully present Petitionary Motion to petition Respectful Judgment to dismiss this Case 92060328 filed by Plaintiff 11/05/2014, and Petitionary Motion to petition Respectful Permission for me not to respond to the Request of Plaintiff's ~~Motion~~ filed 09/23/2016 which is EST I think.

Before amendment 2: REPLY MEMORANDUM IN SUPPORT OF MOTION

The ~~Motion~~ of Plaintiff is attached on page 6/9 to 9/9 as follows.

Before amendment 3: REPLY MEMORANDUM IN SUPPORT OF MOTION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Plaintiff Trademark: LOVE IS FOREVER  
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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

October 01, 2016 JST  
Ref No: Souki 161001

Trademark Trial and Appeal Board  
United States Patent and Trademark Office

Dear Mesdames/Sirs,

Petitionary Motion to Request Respectful Judgment to Dismiss This Case, 92060328, filed by  
Plaintiff 11/05/2014, and  
Petitionary Motion to Petition Permission for me Not to Respond to the Request of  
Plaintiff's **REPLY MEMORANDUM IN SUPPORT OF MOTION**  
arrived to me 09/24/2016 JST by E-mail

I would like to respectfully present Petitionary Motion to petition Respectful Judgment to dismiss  
this Case 92060328 filed by Plaintiff 11/05/2014, and Petitionary Motion to petition Respectful  
Permission for me not to respond to the Request of Plaintiff's **REPLY MEMORANDUM IN  
SUPPORT OF MOTION** filed 09/23/2016 which is EST I think.

The **REPLY MEMORANDUM IN SUPPORT OF MOTION** of Plaintiff is attached on page 6/9 to 9/9 as follows.

The reasons etc of the Petitionary Motions are as follows:

Regarding my Motions etc, receiving highly respectful advice of the Customer Service Representative of Trademark Trial and Appeal Board 09/29/2016 JST, I have been presenting herein. The tracking number is 1-427470541.

The following Reason 1, Reason 2, Reason 3 are reasons of the Petitionary Motions:

Reason 1: Because there have been 6 points which are opposite to truth in **Petition for Cancellation** of Plaintiff filed by, I think, Assigned Attorney, Mr. Milord A. Keshishian on **11/05/2014** as follows, and for certainty I would like to do CORRECTION by using slanting letter style as ***Bold Times New Roman*** as follows:

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA637242**

Filing date: **11/05/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

**Petition for Cancellation**

Notice is hereby given that the following party requests to cancel indicated registration.

**Petitioner Information**

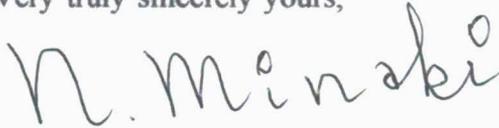
Name	L.A. Gem and Jewelry Design, Inc.		
Entity	Corporation	Citizenship	California
Address	659 South Broadway, 7th Floor Los Angeles, CA 90014 UNITED STATES		

Attorney information	Milord A. Keshishian Milord & Associates, PC 2049 Century Park East, Suite 3850 Los Angeles, CA 90067 UNITED STATES uspto@milordlaw.com Phone:3102267878
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**Registration Subject to Cancellation**

Before amendment 4: **REPLY MEMORANDUM IN SUPPORT OF MOTION**  
to the Request of Plaintiff's Motion filed 09/23/2016.

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

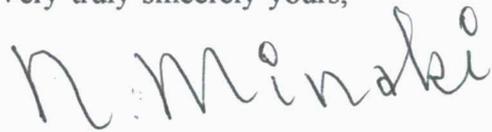
Attached: **PETITIONER'S REPLY MEMORANDUM IN SUPPORT  
OF MOTION TO COMPEL DISCOVERY RESPONSES  
AND TEST THE SUFFICIENCY OF RESPONSES  
TO REQUESTS FOR ADMISSION**

4 pages (page 6/9 ~ 9/9)

After amendment 4

Petitionary Motion to request respectful Judgment to dismiss this Case, 92060328, filed by Plaintiff 11/05/2014, and respectfully present Petitionary Motion to request Permission for me not to respond to the Request of Plaintiff's **REPLY MEMORANDUM IN SUPPORT OF MOTION** filed 09/23/2016.

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

Attached: **PETITIONER'S REPLY MEMORANDUM IN SUPPORT  
OF MOTION TO COMPEL DISCOVERY RESPONSES  
AND TEST THE SUFFICIENCY OF RESPONSES  
TO REQUESTS FOR ADMISSION**

4 pages (page 6/9 ~ 9/9)

Certificate of Service

I hereby certify that on 10/07/2016 JST I have served a true and complete copy of the document, Ref No.: Souki 161004 via First Class Mail, EMS (service of Japan Post), tracking number EG059315251JP, postage prepaid to Mr. Milord A. Keshishian, Assigned Attorney, MILORD & ASSOCIATES, P.C. 10517 West Pico Boulevard, LOS ANGELES, CA 90064, USA.

Date: October 08, 2016 JST

Signature:

A handwritten signature in black ink that reads "N. Minaki". The signature is written in a cursive style with a small circle above the 'i' in "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

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 mina-csj@nifry.com