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

Proceeding	92061441
Party	Plaintiff Thorne Research, Inc.
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Submission	Motion for Default Judgment
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Date	06/19/2015
Attachments	Motion for Default Judgment.pdf(107123 bytes )

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

\* \* \* \* \*

In the Matter of: Registration No. 4,416,539

**THORNE RESEARCH, INC.,**

**Petitioner,**

**vs.**

**HUNCA KOZMETIK, SANAYI  
ANONIM SIRKETI,**

**Registrant.**

**Cancellation No. 92061441**

\* \* \* \* \*

**MOTION FOR DEFAULT JUDGMENT**

Pursuant to Rule 55 of the Federal Rules of Civil Procedure and sections 312 and 508 of the Trademark Trial and Appeal Board Manual of Procedure, petitioner Thorne Research, Inc. (“Thorne”), hereby moves the Board to enter judgment by default against registrant Hunca Kozmetik, Sanayi Anonim Sirketi (“Hunca”).

Thorne filed its Petition to Cancel (“Petition”) in this matter on May 5, 2015. That same day, Thorne serve a copy of the Petition upon Hunca’s registered domestic representative. The Board notified the parties that Hunca’s answer was due June 15, 2015. Nevertheless, Hunca failed to answer or otherwise respond to the Petition within the requisite time.

The Petition requests that the Board cancel Registration No. 4,416,539, and no further hearing is necessary. Accordingly, Thorne respectfully requests that the Board enter default judgment against Hunca and cancel Registration No. 4,416,539.

DATED this 19th day of June, 2015.

PARSONS BEHLE & LATIMER

/Jonathan H. Love/

MARGARET NIVER MCGANN

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing MOTION FOR DEFAULT JUDGMENT upon Registrant's domestic representative by depositing one copy thereof in the United States Mail, first-class postage prepaid on June 19, 2015, addressed as follows:

JOHN S. EGBERT  
EGBERT LAW OFFICES, PLLC  
1314 TEXAS, 21ST FLOOR  
HOUSTON, TEXAS 77002  
UNITED STATES

/Julie L. O'Tyson/