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Filing date: **11/06/2015**

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

Proceeding	92062013
Party	Plaintiff Empire Distribution, Inc.
Correspondence Address	AUSTIN PADGETT TROUTMAN SANDERS LLP 600 PEACHTREE ST NE SUITE 5200 ATLANTA, GA 30308 UNITED STATES trademarks@troutmansanders.com,austin.padgett@troutmansanders.com
Submission	Motion for Default Judgment
Filer's Name	Austin Padgett
Filer's e-mail	trademarks@troutmansanders.com,austin.padgett@troutmansanders.com
Signature	/Austin Padgett/
Date	11/06/2015
Attachments	CHAMPION AUDIO REQUEST.pdf(82641 bytes )

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

_____	)	
EMPIRE DISTRIBUTION, INC.	)	
	)	
Petitioner,	)	Mark: EMPIRE
	)	
v.	)	Registration No.: 3131261
	)	Registration Date: August 15, 2006
CHAMPION AUDIO INC.	)	Cancellation No.: 92062013
	)	
Registrant.	)	
	)	
_____	)	

**REQUEST FOR DEFAULT JUDGMENT**

COME NOW Empire Distribution, Inc. (“Petitioner”), pursuant to 37 C.F.R. § 2.106(a) and Rule 55(a) of the Federal Rules of Civil Procedure, and respectfully requests immediate entry of default judgment against Champion Audio Inc. (“Registrant”) in the above-captioned proceeding.

As grounds for this request, Petitioner states that on October 6, 2015, the Trademark Trial and Appeal Board (the “Board”) provided service by publication to Registrant in the above-captioned proceeding and ordered Registrant to appear within thirty days of the publication. As of the filing date of this request, Registrant has made no such appearance. Pursuant to 37 C.F.R. § 2.106(a), “[i]f no answer is filed within the time set, the opposition may be decided as in case of default.” For these reasons, Petitioner respectfully requests that the Board immediately enter default judgment against Registrant.

*[valediction on following page]*

This 6th day of November 2015.

Respectfully submitted,

TROUTMAN SANDERS LLP

Handwritten signature in black ink, appearing to read "A. Padgett" and "M. D. Hobbs, Jr." with a flourish at the end.

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Austin Padgett (Ohio Bar No. 85368)  
Michael D. Hobbs, Jr. (Georgia Bar No. 358160)  
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	)	
	)	

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent by FedEx, postage prepaid, to counsel of record for the Applicant, as follows:

Champion Audio Inc.  
5650 Fondren Rd.  
Houston TEXAS 77036

This 6th day of November 2015.



\_\_\_\_\_  
Austin Padgett