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

Proceeding	92063165
Party	Plaintiff Orlando Sports Holdings, LLC
Correspondence Address	CLARK A D WILSON MERCHANT & GOULD PC PO BOX 2910 MINNEAPOLIS, MN 55402-0910 UNITED STATES dockmpls@merchantgould.com
Submission	Motion for Default Judgment
Filer's Name	Clark A.D. Wilson
Filer's e-mail	cwilson@merchantgould.com
Signature	/Clark A.D. Wilson/
Date	03/30/2016
Attachments	Motion for Default Judgment.pdf(86007 bytes)

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

ORLANDO SPORTS HOLDINGS, LLC)
)
 Petitioner,)
)
) Cancellation No. 92063165
) GOLD PRIDE (Reg. No. 3897662)
) FC GOLD PRIDE (Reg. No. 3894425)
)
 WOMEN’S SOCCER LLC)
)
 Registrant.)
 _____)

MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER

Petitioner ORLANDO SPORTS HOLDINGS, LLC, by and through its attorney of record, hereby moves for the entrance of a judgment of default for Registrant’s failure to timely answer the Petition for Cancellation.

BRIEF IN SUPPORT OF MOTION

In support of Petitioner’s motion hereof, Petitioner hereby submits the following:

1. Petition for Cancellation setting forth grounds therefore was filed on behalf of Petitioner on February 15, 2016, and served upon the Registrant/Defendant Women’s Soccer, LLC (hereafter, “Respondent”) by United States Mail to the listed address: 1750 Montgomery Street, 1st Floor, San Francisco, CA 94025; the address of the Respondent’s Counsel of Record: Shearman & Sterling, LLP, 1460 El Camino Real, 2nd Floor, Menlo Park, CA 94025; and by email to the listed email of record: *jlik@shearman.com*. A Certificate of Service was included in the Petition.
2. The Petition was assigned Cancellation No. 92063165, and a schedule of proceedings in accordance with the Trademark Rules of Practice was duly sent to the Respondent by mail at the address listed in paragraph 1.
3. Said notice provided, among other matters, that an answer was due forty days from the mailing date of the order, setting the Time to Answer as 3/29/2016.

4. As of the date herein, no answer has been filed or served upon Petitioner, nor with the Trademark Trial and Appeal Board.

5. In accordance with the Petition for Cancellation herein, whereby Respondent has failed to file an answer, Petitioner is entitled to a judgment by default.

WHEREFORE, for all the foregoing reasons, and for all the reasons set forth in the Petition for Cancellation, Petitioner respectfully requests that this Motion for Default Judgment and the Petition for Cancellation of Registration Nos. 3897662 & 3894425 be GRANTED.

Please direct all correspondence to:

Clark A. D. Wilson
MERCHANT & GOULD P.C.
P.O. Box 2910
Minneapolis, MN 55402-0910

Petitioner herein appoints Clark A. D. Wilson, John A. Clifford, Reg. No. 30,247; Gregory C. Golla; Andrew S. Ehard; Scott W. Johnston, Reg. No. 39,721; Heather J. Kliebenstein; Danielle I. Mattessich; Scott M. Oslick; Christopher J. Schulte; William D. Schultz and Anthony R. Zeuli, Reg. No. 45,255 and all other attorneys of the firm of Merchant & Gould P.C., its attorneys to transact all business in the U.S. Patent and Trademark Office relating to this matter with full power of substitution.

ORLANDO SPORTS HOLDINGS, LLC

By its Counsel

Dated: March 30, 2016

/Clark A.D. Wilson/
Clark A. D. Wilson
MERCHANT & GOULD P.C.
191 Peachtree Street, NE., Suite 3800
Atlanta, GA 30303
Telephone: 404.954.5087
Facsimile: 612.332.9081

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2016, a true and correct copy of the foregoing MOTION FOR DEFAULT JUDGMENT was served, via first-class mail, postage prepaid to:

Women's Soccer, LLC
1750 Montgomery Street, 1st Floor
San Francisco, CA 94025

&

Shearman & Sterling, LLP
1460 El Camino Real, 2nd Floor
Menlo Park, CA 94025

And by email to *jlik@shearman.com*

/Clark A.D. Wilson/

CERTIFICATE OF FILING

I hereby certify that this MOTION FOR DEFAULT JUDGMENT is being filed electronically with the United States Patent and Trademark Office's Electronic System for Trademark Trial & Appeals (ESTTA) on this March 30, 2016.

/Clark A.D. Wilson/