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Filing date: **10/30/2006**

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

Proceeding	91172611
Party	Plaintiff St. Louis Cardinals, LLC St. Louis Cardinals, LLC 250 Stadium Plaza St. Louis, MO 63102 UNITED STATES
Correspondence Address	Richard S. Mandel Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES twe@cll.com, trademark@cll.com
Submission	Motion for Default Judgment
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Date	10/30/2006
Attachments	GO CARDS (Doug Lewis) Motion for Default.pdf (3 pages)(21321 bytes)

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

In re Application Serial No. 78/616,520

Filed: April 25, 2005

For Mark: GO CARDS

Published in the Official Gazette: April 18, 2006

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ST. LOUIS CARDINALS, LLC,

Opposer,

v.

DOUGLAS J. LEWIS,

Applicant.

Opposition No. 91 172611

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Commissioner for Trademarks
Attn: Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

MOTION FOR DEFAULT JUDGMENT

MOTION

Pursuant to Trademark Rule 2.106(a), Opposer hereby moves for a default judgment in this proceeding because Applicant has failed to file a timely answer. In the alternative, should this proceeding be reopened, Opposer requests that the discovery and trial periods be reset.

MEMORANDUM

Opposer's motion for default judgment should be granted because Applicant has failed to submit an answer to the Notice of Opposition. The order instituting this opposition was mailed by the Board on August 30, 2006. As the answer was due October 9, 2006, and no answer has been filed or received, and no good cause shown, a default judgment should be entered.

In the event, however, that this proceeding is reopened, Opposer requests that the discovery and trial periods be reset.

Dated: New York, New York
October 30, 2006

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion for Default Judgement was served on Applicant by sending a copy first class, postage prepaid, to Applicant Douglas J. Lewis, 7935 Glenside Place, St. Louis, Missouri 63130-2011 on October 30, 2006.

/Heather L. Jensen/

Heather L. Jensen