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Filing date: **08/22/2007**

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

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|------------------------|---|
| Proceeding | 91178114 |
| Party | Plaintiff The Royal Bank of Scotland Group plc |
| Correspondence Address | Antonio Borrelli Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES axb@cll.com, trademark@cll.com |
| Submission | Motion for Default Judgment |
| Filer's Name | Antonio Borrelli |
| Filer's e-mail | axb@cll.com, trademark@cll.com |
| Signature | /Antonio Borrelli/ |
| Date | 08/22/2007 |
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Ref. No. 25677.003

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

THE ROYAL BANK OF SCOTLAND GROUP PLC,

Opposer,

Opposition No. 91178114

v.

BBDO WORLDWIDE INC.,

Applicant.

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 June 29, 2007. As the answer was due August 8, 2007, 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
August 22, 2007

Respectfully submitted,

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

By: /Antonio Borrelli/
Baila H. Celedonia
Antonio Borrelli
1133 Avenue of the Americas
New York, NY 10036-6799
(212) 790-9200

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's counsel David A. Weems, Esq., Davis & Gilbert LLP, 1740 Broadway, Floor 3, New York, NY 10019-4379, on August 22, 2007.

/Antonio Borrelli/
Antonio Borrelli