

ESTTA Tracking number: **ESTTA311650**

Filing date: **10/15/2009**

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

Proceeding	91187342
Party	Defendant PACIFIC RIM MARKETING INC
Correspondence Address	PACIFIC RIM MARKETING INC 1306 VIA TORNASOL APTOS, CA 95003-5654 UNITED STATES fred@pacrim-marketing.com
Submission	Reply in Support of Motion
Filer's Name	Fred Scherrer
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Date	10/15/2009
Attachments	Applicant Response to Opposer's ACR Opposition.pdf ( 2 pages )(101844 bytes )

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

OPPOSITION No. 9118742,

Sean Puffy Combs,  
Opposer,

-against-

Pacific Rim Marketing, Inc.  
Applicant

Response to Opposer's Opposition to Accelerated Case Resolution

Applicant believes that the court has allowed the Opposer to make their claims and clearly state their position. Applicant has responded to all claims allowed by the court, including the most recent, in which the Court allowed Opposer to add "is descriptive of the goods covered by the subject application". ( 09/02/2009 *Trial Dates Reset under Prosecution History.*)

Applicant believes that all Applicant's response to each claim have thoroughly addressed the position and claims made by the Opposer and it is up to the Administrative Trademark Judges to rule on this matter.

Applicant believes that Accelerated Case Resolution is appropriate for this matter and requests the Court to allow the process of Accelerated Case Resolution for resolving this matter.

Finally, with respect to Discovery, Applicant requests the Interlocutory Attorney to be involved in the Discovery Conference by telephone conference call.

Respectfully submitted,

/fred scherrer 1024/

**Applicant Confirmation of Proof of Service to Opposer**

This will confirm that the Opposer Sean Puffy Combs as represented by  
Fross Zelnick Lehrman & Zissu, P.C.  
Robert Becker Attorney  
866 United Nations Plaza  
New York, NY 10017 UNITED STATES  
[rbecker@frosszelnick.com](mailto:rbecker@frosszelnick.com)

The undersigned hereby certifies that a true and correct copy of the foregoing "Response to PTO" was served upon opposer by forwarding said copy, via email, to Mr. Robert Becker, at the email address [rbecker@frosszelnick.com](mailto:rbecker@frosszelnick.com) on October 15, 2009.

/fred scherrer 1024/