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Filing date: **03/04/2013**

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

Proceeding	91208014
Party	Defendant Best-Lock Group Ltd.
Correspondence Address	ROBERT C FABER OSTROLENK FABER LLP 1180 AVENUE OF THE AMERICAS FL 7 NEW YORK, NY 10036 8443 UNITED STATES tm@ostrolenk.com
Submission	Other Motions/Papers
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Signature	/stephen j quigley/
Date	03/04/2013
Attachments	01433047.PDF (5 pages)(135704 bytes)

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

In the Matter of Application No. 85/504,990

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LEGO JURIS A/S,	:	
	:	
Opposer,	:	Opposition No. 91208014
	:	
v.	:	
	:	
BEST-LOCK GROUP LTD.	:	
	:	
Applicant.	:	
-----X		

**APPLICANT’S REPLY TO
ORDER TO SHOW CAUSE FOR DEFAULT
and
STIPULATED REQUEST TO EXTEND THE ANSWER DEADLINE**

Applicant, Best-Lock Group Ltd., by and through its attorneys, Ostrolenk Faber LLP, hereby replies to the order to show cause why judgment by default should not be entered against Applicant.

Applicant never received the Notice of Opposition from either the Board or from Opposer and did not receive the Board’s November 14, 2012 Scheduling Order. Accordingly, default judgment should not be entered.

Attached as Exhibit 1 to this Reply is the Declaration of Lauren Ngai, Ostrolenk Faber’s docket clerk, stating that she never received either the Notice of Opposition or the Scheduling Order in this case. Therefore, Applicant had no knowledge of the captioned proceeding until the January 31, 2013 order to show cause was received.

The delay in submitting the Answer was not the result of willful conduct or gross neglect by

Applicant's attorneys and Applicant submits that Opposer will not be substantially prejudiced by the delay.

Applicant and Opposer are currently engaged in settlement discussions and jointly request an extension of the Answer deadline for 60 days from the date of this request, i.e., April 30, 2013.

WHEREFORE, Applicant has shown good cause why a judgment of default should not be entered in this proceeding.

Respectfully submitted,



Robert C. Faber
Stephen J. Quigley

Dated: March 4, 2013
New York, New York

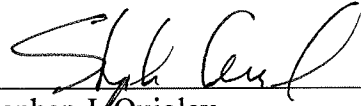
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing APPLICANT'S REPLY TO ORDER TO SHOW CAUSE and STIPULATED REQUEST TO EXTEND ANSWER DEADLINE was served on Opposer by first class mail, postage prepaid, this 4th day of March, 2013, to Opposer's attorney:

David Ehrlich, Esq.
Fross Zelnick
866 UN Plaza
New York, NY 10017



Stephen J. Quigley

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

In the Matter of Application No. 85/504,990

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BEST-LOCK GROUP LTD.	:	
	:	
Applicant.	:	
-----X	:	

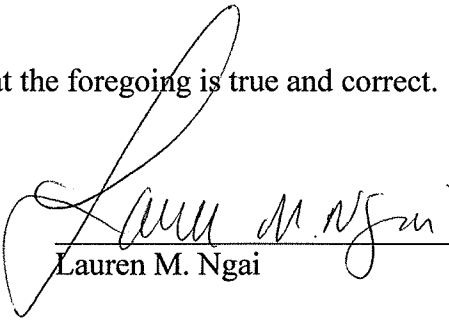
DECLARATION OF LAUREN M. NGAI

Lauren M. Ngai declares as follows:

1. I am the Docketing Clerk for the firm Ostrolenk Faber LLP, attorneys of record for Applicant, Best-Lock Group Ltd.
2. My responsibilities as Docketing Clerk include reviewing, calendaring and forwarding to the appropriate attorney all pleadings, notices, orders and other documents received from the Trademark Trial and Appeal Board. These responsibilities pertain to both printed and electronically generated pleadings, notices, orders and other documents received from the Trademark Trial and Appeal Board.
3. I am not aware of ever receiving the Notice of Opposition in the captioned matter, nor the Board's Scheduling Order. I did receive a postcard from the Board dated August 8, 2012 reporting that an extension of the time to oppose Application No. 85/504,990 had been filed. I also received the Board's January 31, 2013 order to show cause.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: February 25, 2013
New York, New York



Lauren M. Ngai