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

Proceeding	91212191
Party	Plaintiff Alpinestars Research S.r.l.
Correspondence Address	DEAN R KARAU FREDRIKSON & BYRON 200 SOUTH SIXTH STREET, SUITE 4000 MINNEAPOLIS, MN 55402-1425 UNITED STATES cmoyer@fredlaw.com
Submission	Motion for Default Judgment
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Date	09/29/2014
Attachments	Motion for default 1.pdf(14064 bytes)

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

Alpinestars Research S.r.l.,

Opposer,

Opposition No. 91212191

v.

Serial No. 85711235

Kin Collective, Inc.,

Applicant.

MOTION FOR DEFAULT JUDGMENT

Opposer, Alpinestars Research S.r.l., requests the Board to enter a default judgment against Applicant, Kin Collective, Inc., and in support of this request, Alpinestars states as follows:

1. On August 8, 2013, Alpinestars filed a notice of opposition.
2. On August 28, 2013, the Board issued notice of the filing of the opposition and set trial dates, including October 7, 2013, as the due date for Kin's answer.
3. The parties stipulated to a number of suspensions and/or extensions, and in each case the Board reset the dates.
4. On July 2, 2014, Kin submitted a Motion for an Extension of Answer or Discovery or Trial Periods with Consent, proposing, among other things, that Kin's answer would be due on September 2, 2014.
5. On July 2, 2014, the Board granted the motion, and reset the trial dates as set out in the motion.
6. Alpinestars was not served with an answer to the notice of opposition on or before

September 2, 2014, and there is no record of Kin having filed an answer to the notice of opposition on or before September 2, 2014.

7. Alpinestars has never been served with an answer to the notice of opposition at any time, and there is no record of Kin having filed an answer to the notice of opposition at any time.

8. Alpinestars respectfully requests that the Board enter judgment in favor of Alpinestars, sustaining its opposition and refusing registration of the mark in Serial No. 85711235.

Dated: September 29, 2014



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the MOTION FOR DEFAULT JUDGMENT was served by First Class Mail on the correspondent of record for Applicant, Yi Sun Kim, Greenberg & Bass LLP, 16000 Ventura Blvd, Ste 1000, Encino, CA 91436-2762, by mailing it to the address of record, this 29th day of September, 2014.

