

ESTTA Tracking number: **ESTTA643964**

Filing date: **12/11/2014**

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

Proceeding	91218677
Party	Plaintiff EMVCo, LLC
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Submission	Motion for Default Judgment
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Date	12/11/2014
Attachments	MOBISPOT Mot for Default Judgment - 2014-12-11 - 91218677.pdf(173332 bytes )

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

EMVCo, LLC,

Opposer,

v.

OBSHESTVO S OGRANICHENNOI  
OTVETSTVENNOS TIYU; "TRI AR  
MEMORY",

Applicant.

Opposition No.: 91218677  
Application Serial No.: 79132479



OPPOSER'S MOTION FOR DEFAULT  
JUDGMENT

On October 1, 2014, opposer EMVCo, LLC ("Opposer") filed a Notice of Opposition in this proceeding against U.S. trademark application Serial No. 79/132,479 ("Application"). On October 6, 2014, the Trademark Trial and Appeal Board ("TTAB") issued the Notice of Opposition and discovery and testimony schedule to Opposer and to applicant OBSHESTVO S OGRANICHENNOI OTVETSTVENNOS TIYU; "TRI AR MEMORY" ("Applicant"), setting a November 15, 2014 date for answering the Notice.

Applicant did not file an answer to the Notice, and Opposer hereby requests that a default judgment be entered in Opposer's favor and that the Application be deemed abandoned pursuant to 37 CFR § 2.106(a); 37 CFR § 2.114(a); TBMP §§ 312, 508; and Fed. R. Civ. P. 55.

In the alternative and only in the event that Applicant establishes good cause why default judgment should not be entered, Opposer respectfully requests that the TTAB reset the discovery and testimony schedule to allow adequate time for Opposer to prosecute the opposition.

DATED: December 11, 2014.

<p><b>CERTIFICATE OF SERVICE</b></p> <p>I hereby certify that this OPPOSER'S MOTION FOR DEFAULT JUDGMENT is being deposited with the United States Postal Service with sufficient postage as first class mail on December 11, 2014 in an envelope addressed to the listed correspondent for the Application:</p> <p>Maria Eliseeva Patentbar International PC 1087 Beacon St, Suite 303 Newton, MASSACHUSETTS 02459</p> <p>Signature: <u></u> Printed Name: <u>John P. Halski</u></p>	<p>Respectfully submitted,</p> <p>PERKINS COIE LLP</p> <p><u></u> Patchen Haggerty John P. Halski Attorneys for Opposer 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 (206) 359-8000</p>
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