

ESTTA Tracking number: **ESTTA1089652**

Filing date: **10/19/2020**

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

|                        |  |
|------------------------|--|
| Proceeding             | 91245118   |
| Party                  | Plaintiff<br>Audemars Piguet Holding SA  |
| Correspondence Address | JOHN GALBREATH<br>GALBREATH LAW OFFICES PC<br>2516 CHESTNUT WOODS CT<br>REISTERSTOWN, MD 21136<br>UNITED STATES<br>Primary Email: jgalbreath@galbreath-law.com<br>Secondary Email(s): jgalbreath@verizon.net<br>410-628-7770 |
| Submission             | Reply in Support of Motion   |
| Filer's Name           | John A. Galbreath  |
| Filer's email          | jgalbreath@galbreath-law.com, jgalbreath@verizon.net   |
| Signature              | /John A. Galbreath/  |
| Date                   | 10/19/2020   |
| Attachments            | 91245118-Opposer Reply in Motion for Default Judgment.pdf(95173 bytes )  |

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|-------------------------------------|---|---|
| <b>Audemars Piguet Holding S.A.</b> | ) | <b>IN THE UNITED STATES</b>             |
|                                     | ) | <b>PATENT AND TRADEMARK OFFICE</b>      |
| <b>Plaintiff/Opposer</b>            | ) |   |
|                                     | ) | <b>TRADEMARK TRIAL AND APPEAL BOARD</b> |
| <b>v.</b>                           | ) |   |
|                                     | ) |   |
| <b>Oakcoins</b>                     | ) | <b>APPL. NO. 87/838,976</b>             |
|                                     | ) |   |
| <b>Defendant/Applicant</b>          | ) | <b>OPPOSITION NO. 91245118</b>          |
| _____                               | ) |   |

**OPPOSER’S REPLY IN MOTION FOR DEFAULT JUDGMENT**

On October 9, 2020, Oakcoins (“Oakcoins”, “Defendant”, or “Applicant”) submitted a filing which it labeled “Answer”, and which the Board has labeled “D[efendant] Exhibits”. In an abundance of caution and in case Oakcoins’s filing might somehow be considered a response in opposition, Audemars Piguet Holding S.A. (“Audemars Piguet”, “Plaintiff”, or “Opposer”) makes the following reply:

Oakcoins’s filing does not meet the requirements for a response in opposition to Audemars Piguet’s Motion for Default Judgment. The filing does not mention the motion in any way. The filing also provides no explanation or justification as to why Oakcoins failed to comply with the Board’s August 24, 2020 Order. Thus, the Board should treat the motion as conceded. 37 CFR § 2.127(a).

Audemars Piguet further notes that to date, Oakcoins has not served any of the discovery responses it was ordered to provide.

**CONCLUSION**

For the above reasons and those set forth in Audemars Piguet’s main brief, default judgment should be entered against Oakcoins and its application terminated with prejudice.

Respectfully submitted,

/John A. Galbreath/  
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Attorneys for Opposer

Certificate of Service: I certify that on the date below, the foregoing Reply in Motion for Default Judgment and referenced attachments, if any, were served by e-mail on the applicant OAKCOINS at the following correspondence email address:

coins@oakcoins.com

19 October 2020

/John A. Galbreath/  
John A. Galbreath