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Filing date: **03/16/2020**

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

Proceeding	91253756
Party	Plaintiff Los Angeles Dodgers LLC
Correspondence Address	JUSTIN I KARASICK COWAN LIEBOWITZ & LATMAN PC 114 W 47TH ST NEW YORK, NY 10036 UNITED STATES trademark@cll.com, mlk@cll.com, jik@cll.com, las@cll.com 212-790-9200
Submission	Motion for Default Judgment
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Signature	/Justin I. Karasick/
Date	03/16/2020
Attachments	LA Force - Motion for Default Judgment - File Copy.pdf(20047 bytes )

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

In re Application Serial Nos. 88/398,060  
Filed: April 23, 2019  
For Mark: LA FORCE  
Published in the Official Gazette: August 20, 2019

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LOS ANGELES DODGERS LLC,	:	
Opposer,	:	Opposition No. 91253756
	:	
v.	:	
	:	
TAM DOAN NGOC,	:	
Applicant.	:	
	:	
-----X	:	

Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**MOTION FOR DEFAULT JUDGMENT**

**MOTION**

Pursuant to Trademark Rule 2.106(a), Opposer Los Angeles Dodgers LLC hereby moves for a default judgment in this proceeding because Tam Doan Ngoc (“Applicant”) has failed to file a timely answer. In the alternative, should this proceeding be reopened, Opposer requests that the discovery and trial periods be reset.

**MEMORANDUM**

Opposer’s motion for default judgment should be granted because Applicant has failed to submit an answer to the Notice of Opposition. An order instituting this opposition proceeding was sent by the Board on January 30, 2020, setting a March 10, 2020 answer deadline.

As the answer was due March 10, 2020, and no answer has been filed or received, and no good cause shown, a default judgment should be entered. In the event, however, that this proceeding is reopened, Opposer requests that the discovery and trial periods be reset.

Dated: New York, New York  
March 16, 2020

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposers*

By:           /Justin I. Karasick/            
Mary L. Kevlin  
Justin I. Karasick

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New York, New York 10036  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 16, 2020, I caused a copy of the foregoing  
MOTION FOR DEFAULT JUDGMENT to be sent via email to the Correspondent of Record,  
Tam Doan Ngoc at [vantt@laforce.vn](mailto:vantt@laforce.vn)

Dated: New York, New York  
March 16, 2020

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/Justin I. Karasick/  
Justin I. Karasick