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

Proceeding	91254790
Party	Plaintiff RST Brands, LLC
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Submission	Motion for Default Judgment
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Date	05/09/2020
Attachments	2020-05-08 RST Motion for Default - FLOW PLY.pdf(98476 bytes )

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

In the matter of  
Trademark Application Serial Number 88/636,310  
Opposed Mark: FLOW PLY  
Published in the Official Gazette on February 18, 2020

RST BRANDS, LLC

Opposer,

vs.

WORLD MERCHANT LTD.,

Applicant.

Opposition No.: 91254790

**MOTION FOR DEFAULT JUDGMENT**

Pursuant to Fed. R. Civ. P. 55, 37 C.F.R. § 2.106(a) and 37 C.F.R. § 2.114(a), Opposer RST Brands, LLC (“RST”) hereby moves for default judgment against World Merchant Ltd. (“Applicant”) for failure to timely file an Answer to the Opposition to the application for FLOW PLY (Serial Number 88/636,310).

1. On March 19, 2020, RST filed a Notice of Opposition against registration of the mark “FLOW PLY” shown in Serial Number 88/636,310 in International Class 20 claiming that it will be damaged by registration of that mark.

2. On March 19, 2020, the TTAB issued a Notice of Institution of the Opposition, notified the parties pursuant to 37 CFR § 2.105(a) and (b), and set a deadline of April 28, 2020 for Applicant to file an Answer to the Opposition.

3. To date, Applicant has not filed an Answer to the Opposition. Applicant has also not filed a request for an extension or reached out to RST's counsel explaining why it has not filed an Answer.

4. RST respectfully requests that default be entered against Applicant for failure to timely Answer the Opposition, that the opposition be dismissed with prejudice, and that the FLOW PLY Application be refused registration.

Respectfully submitted,

Dated: May 8, 2020

/Robert E. Aycock/

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**CERTIFICATE OF SERVICE**

I hereby certify that an original copy of the foregoing **MOTION FOR DEFAULT JUDGMENT** was transmitted online on May 8, 2020, through the ESTTA website of the Trademark Trial and Appeal Board of the United States Patent and Trademark Office and was served by email on counsel for Applicant as required by the Trademark Trial and Appeal Board.

/William B. Chadwick/

William B. Chadwick