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Filing date: **09/17/2020**

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

Proceeding	91263905
Party	Plaintiff Scents & Senses Company, S.L., Ms. Shakira I Mebarak
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Submission	Motion for Default Judgment
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Signature	/bdr/
Date	09/17/2020
Attachments	SHAKIVA Motion for Default Judgment.pdf(14969 bytes )

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

In the Matter of Trademark Application  
Serial No. 88/704,800  
Mark: SHAKIVA  
Filing Date: November 25, 2019

SHAKIRA ISABEL MEBARAK,	X	
P/K/A SHAKIRA, and SCENTS & SENSES	:	
COMPANY, S.L.,	:	
Opposers,	:	
	:	Opposition No. 91/263,905
-against-	:	
	:	
GUANGZHOU SHAQILA INTERNATIONAL	:	
TRADING CO. LTD.,	:	
	:	
Applicant.	:	
	X	

**MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER**

Shakira Isabel Mebarak p/k/a Shakira (“Shakira”) and Scents & Senses Company, S.L. (“Scents & Senses”, collectively with Shakira “Opposers”), respectfully request that the Trademark Trial and Appeal Board (the “Board”) enter a Judgment of Default against Applicant Guangzhou Shaqila International Trading Co., Ltd. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (“FRCP 55(a)”) and Rule 2.106(a) of the Trademark Rules of Practice (“TMRP 2.106(a)”) on the grounds that Applicant has failed to file an Answer or enter an appearance in this matter.

1. According to FRCP 55(a), “when a party against whom judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by the rules and the fact is made to appear by affidavit or otherwise, the clerk shall enter the party’s default.”

2. Opposer filed a Notice of Opposition on July 29, 2020. The deadline to file an Answer to the Notice of Opposition was September 7, 2020. Applicant did not submit an Answer.

3. Having failed to file a timely Answer or enter an appearance, Applicant has conceded the truth of the claims made in the Notice of Opposition. Therefore, pursuant to FRCP 55(a) and TMRP 2.106(a), Opposer respectfully requests that the Board enter a Judgment by Default against Applicant.

Dated: New York, New York  
September 17, 2020

Respectfully submitted,

**PRYOR CASHMAN LLP**

By:           /Brad D. Rose/          

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*Attorneys for Opposers Shakira Isabel Mebarak  
p/k/a Shakira and Scents & Senses Company,  
S.L.*

**CERTIFICATE OF SERVICE**

A true and correct copy of the Motion for Default Judgment was sent to Applicant at the following email addresses on September 17, 2020:

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