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Filing date: **01/25/2021**

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

|                        |  |
|------------------------|--|
| Proceeding             | 91266257   |
| Party                  | Defendant<br>Khangri Sourcing  |
| Correspondence Address | KRIS JENSEN<br>JENSEN LEGAL<br>2775 HARBOR AVENUE SW, FLOOR 4<br>NANIQQ<br>SEATTLE, WA 98126<br>UNITED STATES<br>Primary Email: krisjensen@comcast.net<br>206-617-9173 |
| Submission             | Motion for Relief from entry of Default Judgment   |
| Filer's Name           | Kris Jensen  |
| Filer's email          | krisjensen@jensenlegal.com, krisjensen@comcast.net   |
| Signature              | /s/Kris Jensen   |
| Date                   | 01/25/2021   |
| Attachments            | Declaration and Motion to set aside default TTAB 91266257.pdf(127384 bytes )   |

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

**NANI SWIMWEAR INC.,**  
Opposer,  
vs.  
**KHANGRI SOURCING,**  
Applicant.

DECLARATION OF COUNSEL AND  
MOTION TO SET ASIDE DEFAULT  
JUDGMENT  
Opposition No. **91266257**  
Application No. **90015852**

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TO:  
USPTO  
Trademark Trial and Appeal Board

AND TO:  
Opposer, Nani Swimwear, c/o Attorney  
listed below

**DECLARATION OF COUNSEL**

I am the attorney representing Khangri Sourcing in USPTO application Serial number 90015852 for USPTO trademark registration”). I filed this mark on June 23, 2020. Notice of Publication was received via email at my office from the USPTO on October 14, 2020.

I have made a diligent search of my computer network and do not find any electronic communications from the USPTO or from Opposer that 90015852 was being opposed.

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3 I have made diligent search of my incoming physical mail and do not find any  
4 written documents from the USPTO or from Opposer that 90015852 was being opposed.

5 On January 21, 2021, I received an electronic notice from the USPTO and TTAB,  
6 indicating that 90015852 was being opposed and that a Notice of Default had entered.

7 Simply said, I had no knowledge that 90015852 was being opposed until I  
8 received the Notice of Default. I have searched my electronic files and physical files and  
9 cannot find any notice of the opposition prior to 1/21/2021.

10  
11 **I hereby certify under penalty of perjury under the laws of the United States**  
12 **and the State of Washington that the above statement is true and correct.**

13 /s/Kris Jensen, signed at Seattle, WA Date: 1/25/2021

14  
15 **Applicant's Answer to the Notice of Default**

16 In response to the Notice of Default issued by the Board on 1/21/2021, the  
17 applicant, Khangri Sourcing, requests the TTAB to set aside the default and reinstitute  
18 trial proceedings.

19 **MOTION**

20 Applicant, Khangri Sourcing, Motions the Court to set aside the default and  
21 reinstitute trial proceedings.

22  
23 **Appointment of Counsel**

24 Khangri Sourcing hereby appoints Kris R. Jensen, a member of the Bar of the  
25 State of Washington, with his offices listed below and herein, as its attorney, with full  
26 power of substitution and revocation, to defend this Opposition and to transact all  
27 business connected with this Opposition in the Patent and Trademark Office and the

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3 United States courts, to sign its name to all papers which may hereafter be filed in  
4 connection with said Opposition and to receive official communications relating to same.

5 Please direct all correspondence in this matter to Kris R. Jensen, to the contact  
6 information below.

7 Respectfully,

8 DATED this January 25, 2021.

9 /s/Kris Jensen  
10 Kris R. Jensen, WSBA # 19261  
11 Attorney for Applicant  
12 2775 Harbor Ave. SW, Floor 4, Suite D  
13 Seattle, WA 98126  
14 [KrisJensen@JensenLegal.com](mailto:KrisJensen@JensenLegal.com)  
15 (206) 617-9173

16 **CERTIFICATE OF FILING WITH ESTTA**

17 I hereby certify that this paper together with any exhibits referenced therein  
18 were filed with the USPTO's ESTTA filing service on the date listed above.

19 /s/Kris Jensen  
20 Kris Jensen

21 **CERTIFICATE OF EMAILING TO PLAINTIFF/OPOSER**

22 I hereby certify that this paper together with any exhibits referenced therein  
23 were emailed to the Plaintiff/Opposition party at this email address:

24 Email address: Preston@projectcip.com

25 /s/Kris Jensen  
26 Kris Jensen