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

Proceeding no.	91301120
Party	Plaintiff LooseLeaf International LLC
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Submission	Other Consented: No Other filing reasoning: PETITIONER'S REQUEST FOR ENTRY OF DEFAULT JUDGMENT
Certificate of service	Method of service: Email I hereby certify that a true and complete copy of Other has been served on 02/10/2026 by delivering a copy to Kenneth I. Tolar by email at ktolar@nolaipa.com; tolar@tolarlawoffice.com.
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Date	02/10/2026
Attachments	PLAINTIFF'S RESPONSE TO BOARD ORDER AND REQUEST FOR ENTRY OF JUDGMENT.pdf (Undesignated 203 KB 5 pages) Description: Other

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

LooseLeaf International LLC, Petitioner, v. All American Brands Inc., Applicant.	Opposition No.: 91301120 For the mark: HOOD LEAFS Application No.: 98687579
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Trademark Trial and Appeal Board
Commissioner for Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451

PETITIONER’S REQUEST FOR ENTRY OF DEFAULT JUDGMENT

On February 2, 2026, the Board entered an ORDER stating,

“On January 27, 2026, the Board sustained the opposition against Applicant in Opposition No. 91301131, refusing registration to Applicant of the mark in application, Serial No. 98687579. Accordingly, that application, which is also involved in this opposition, now stands abandoned.... While the entry of judgment in the other opposition and resulting abandonment of the application does not dictate that judgment automatically be entered in this case, the application shall remain abandoned.... Opposer is allowed until **THIRTY DAYS** from the date of this order to inform the Board whether it wishes to go forward and seek judgment in this opposition proceeding.” (Emphasis in original.)

Pursuant to TBMP § 508, Federal Rule of Civil Procedure 55, and the Board’s Order above, Petitioner, LooseLeaf International LLC (“Petitioner” or “LooseLeaf”) respectfully requests that judgment be entered in Petitioner’s favor in this opposition proceeding for the following reasons: (1) there is *no* “good cause” excusing All American Brands, Inc.’s (“Applicant”) failure to file an answer (or otherwise defend itself); and (2) to avoid prejudicing Petitioner.

ARGUMENT

On August 19, 2025, Petitioner filed a notice of opposition. [1 TTABVUE.]

On October 29, 2025, Applicant filed a (late) second motion to extend time to answer the complaint (both times without consent). [7 TTABVUE.]

On November 16, 2025, Petitioner filed an opposition to the second extension motion and requested that the Board enter default against Applicant because Applicant had not shown “good cause” or “excusable neglect.” [See 9 TTABVUE.] Applicant **did not** file a reply in support of its second extension motion and **still has not** filed an answer to the complaint.

On December 10, 2025, the Board entered a notice of default against Applicant for its failure to answer in Opposition No. [91301131](#) (*Maple Leaf Sports & Entertainment Partnership v. All American Brands Inc.*). The present opposition involves the same Applicant, the same mark, and the same application, and Applicant has similarly failed to participate in this proceeding.

On January 27, 2026, in Opposition No. [91301131](#), the Board issued a final decision sustaining the opposition against Applicant, entering judgment by default, and refusing registration of Applicant’s mark in Application Serial No. [98687579](#) on grounds that included likelihood of confusion under Section 2(d) of the Trademark Act. As a result of that decision, Application Serial No. [98687579](#), which is the subject of the present opposition, now stands abandoned.

Although the Board noted entry of judgment in the related opposition does not automatically dictate entry of judgment in this proceeding (10 TTABVUE), Petitioner respectfully submits that entry of judgment here is also appropriate. As an initial matter,

TBMB § 508 explains that “the issue of whether default judgment should be entered against a defendant when it fails to file a timely answer to the complaint may also be raised by means other than the Board’s issuance of a notice of default.” The Board has not entered formal notice of default in this action but did in Opposition No. [91301131](#), and Applicant did not respond, which shows that Applicant has not been diligent. In any event, Petitioner filed its opposition to Applicant’s second (and dilatory) motion to extend time and requested entry of default nearly 3 months ago, which effectively functions as a notice of default. Despite requesting additional time to file an answer to the complaint (7 TTABVUE) and Petitioner’s opposition requesting entry of default, Applicant **did not** respond to Petitioner’s opposition and **still has not** filed an answer. Thus, default judgment is appropriate because the Applicant cannot (and has not even tried to despite months of time) show “good cause” to excuse its dilatory actions under Fed. R. Civ. P. 55(c). The Board should enter judgment default for this reason alone.

Oppose further requests the Board enter default judgment to avoid prejudicing Petitioner, which has a continuing and legitimate interest in obtaining judgment in its favor. Indeed, default judgment would clarify the parties’ rights and preclude possible future attempts by Applicant to seek registration of the same or confusingly similar mark, which would result in unnecessary duplicative proceedings concerning the same application. For this additional reason, Petitioner respectfully requests that the Board enter default judgment against Applicant.

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CONCLUSION

Accordingly, Petitioner respectfully requests that the Board sustain the opposition against Applicant, enter judgment by default, and refuse registration of Applicant's mark in Application Serial No. [98687579](#).

Respectfully submitted,

Dated: February 10, 2026


By: /s/ Daniel M. Staren
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PROOF OF SERVICE

I, Adam Stocks, hereby certify that a true and complete copy of the foregoing **PETITIONER'S RESPONSE TO BOARD ORDER AND REQUEST FOR ENTRY OF JUDGMENT** was served by emailing a copy on February 10, 2026, to Applicant's attorney record, as follows:

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Dated: February 10, 2026

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