

MOTION FOR RECONSIDERATION.

TTAB

WE RESPONDED TO THE
PETITIONERS PETITION WITH
A BRIEF REPLY BUT NOT
TO EACH AND EVERY OF
THE 33 CLAIMS. I WAS ADVISED
BY LEGAL COUNCIL TO FILE
THIS PETITION AND ATTACH
OUR RESPONSE...

ATTACHED IS OUR RESPONSE
TO EACH AND EVERY ONE OF
THE PETITIONERS CLAIMS.

PLEASE RECONSIDER THIS
DECISION



06-03-2013

U.S. Patent & TMO/™ Mail Rpt Dt. #22

STEVE SOTO

5/22/2013

Chapter 500
STIPULATIONS AND MOTIONS

517 Motion to Strike Brief on Motion

Specific provision is made in the Trademark Rules of Practice for the filing of a brief in support of a motion, a brief in opposition to a motion, and a reply brief in further support of the motion. No further papers will be considered regarding the motion and any such papers may be returned to the filing party as being filed in violation of the rules.²⁷⁹

Subject to the provisions of Fed. R. Civ. P. 11, a party is entitled to offer in its brief any argument it feels will be to its advantage. Accordingly, when a moving brief, an opposition brief, or a reply brief on a motion has been regularly filed, the Board generally will not strike the brief, or any portion thereof, upon motion by an adverse party that simply objects to the contents thereof. Rather, any objections which an adverse party may have to the contents of such a brief will be considered by the Board in its determination of the original motion, and any portions of the brief that are found by the Board to be improper will be disregarded.

However, if a brief in opposition to a motion, or a reply brief in support of the motion, is not timely filed, it may be stricken, or given no consideration, by the Board.

518 Motion for Reconsideration of Decision on Motion

37 CFR § 2.127(b) Any request for reconsideration or modification of an order or decision issued on a motion must be filed within one month from the date thereof. A brief in response must be filed within 15 days from the date of the service of the request.

A request for reconsideration or modification of an order or decision issued on a motion must be filed within one month from the date of the order or decision.²⁸⁰ Unless the Director, upon petition, waives the time requirement of 37 CFR § 2.127(b), the Board need not consider a request for reconsideration or modification filed more than one month from the date of the order or decision complained of.²⁸¹ Nor does the rule contemplate a second request for reconsideration of the same basic issue.²⁸² However, the Board may, on its own initiative, reconsider and modify one of its orders or decisions if it finds error therein, and the Board may also, in its discretion, consider an untimely request for reconsideration or modification.²⁸³

²⁷⁹ See 37 CFR § 2.127(a). See also TBMP § 502.02(b) (Briefs on Motions).

²⁸⁰ See 37 CFR § 2.127(b) and *Baron Philippe de Rothschild S.A. v. Styl-Rite Optical Mfg. Co.*, 55 USPQ2d 1848, 1854 (TTAB 2000).

²⁸¹ See *Avedis Zildjian Co. v. D. H. Baldwin Co.*, 181 USPQ 736 (Comm'r 1974).

²⁸² See *Giant Food, Inc. v. Standard Terry Mills, Inc.*, 231 USPQ 626 (TTAB 1986) and *Avedis Zildjian Co. v. D.G. Baldwin Co.*, *supra*.

²⁸³ See *Avedis Zildjian Co. v. D. H. Baldwin Co.*, *supra*.

Chapter 500
STIPULATIONS AND MOTIONS

Any brief in response to a request for reconsideration or modification of an order or decision issued on a motion must be filed within 15 days from the date of service of the request (20 days if service of the request was made by first-class mail, "Express Mail," or overnight courier--see 37 CFR § 2.120(c)).²⁸⁴

When a party upon which a motion has been served fails to file a brief in response, and the Board grants the motion as conceded pursuant to 37 CFR § 2.127(a), the nonresponding party cannot use a request for reconsideration as a second opportunity to file a brief in opposition to the motion.²⁸⁵

Generally, the premise underlying a motion for reconsideration, modification or clarification under 37 CFR § 2.127(b) is that, based on the facts before it and the prevailing authorities, the Board erred in reaching the order or decision it issued. Such a motion may not properly be used to introduce additional evidence, nor should it be devoted simply to a reargument of the points presented in a brief on the original motion. Rather, the motion should be limited to a demonstration that based on the facts before it and the applicable law; the Board's ruling is in error and requires appropriate change.²⁸⁶

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WITH
STEVE
SOTO

An interlocutory motion, request, or other matter which is not actually or potentially dispositive of a proceeding, may be acted upon by a single Board administrative trademark judge, or by a Board interlocutory attorney to whom authority so to act has been delegated.²⁸⁷ When a single Board administrative trademark judge, or a single duly authorized interlocutory attorney, has acted upon an interlocutory motion, request, or other matter not actually or potentially dispositive of the proceeding, and one or more of the parties is dissatisfied with the action, the dissatisfied party or parties may seek review thereof by requesting, under 37 CFR § 2.127(b), the same single Board judge, or the same single interlocutory attorney, to reconsider the action, and/or by filing a petition to the Director for review of the decision under 37 CFR § 2.146(e)(2) (see TBMP § 905). A request that the action of the single Board judge, or single interlocutory attorney, be reviewed by one or more (other) administrative trademark judges of the Board is improper and will be denied. However, at final hearing, the Board panel to which the case is assigned for decision may review an interlocutory ruling and reverse it, if appropriate.²⁸⁸

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THAT WE
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REPLY TO
ALL 33

²⁸⁴ See 37 CFR § 2.127(b).

²⁸⁵ See *Joy Manufacturing Co. v. Robbins Co.*, 181 USPQ 408 (TTAB 1974). Cf. *General Tire & Rubber Co. v. Gendelman Rigging & Trucking Inc.*, 189 USPQ 425 (TTAB 1975).

²⁸⁶ Cf. TBMP § 543 (Motion for Reconsideration of Final Decision).

²⁸⁷ See 37 CFR § 2.127(c). See also TBMP § 502.04 (Determination of Motions).

²⁸⁸ See, for example, *Harley-Davidson Motor Co. v. Pierce Foods Corp.*, 231 USPQ 857, 859 n.13 (TTAB 1986).

DECISION

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

RK

Mailed: February 21, 2013

Cancellation No. **92055394**

Marc Eberle

v.

Stevie Soto
DBA Goodfellas Tattoo

Yong Oh (Richard) Kim, Interlocutory Attorney:

On May 24, 2012, the Board issued a notice of default for respondent's failure to file an answer. The Board allowed respondent until June 23, 2012, to show cause why default judgment should not be entered against him. On June 13, 2012, respondent timely filed a response to the Board's notice.

Whether default judgment should be entered against a party is determined in accordance with Fed. R. Civ. P. 55(c), which reads in pertinent part: "The court may set aside an entry of default for good cause" As a general rule, good cause to set aside a defendant's default will be found where the defendant's delay has not been willful or in bad faith, when prejudice to the plaintiff is lacking, and where the defendant has a meritorious defense. See *Fred Hyman Beverly Hills, Inc. v. Jacques Bernier, Inc.*, 21 USPQ2d 1556 (TTAB

Cancellation No. 92055394

1991). Moreover, the Board is reluctant to grant judgments by default, since the law favors deciding cases on their merits. See *Paolo's Associates Limited Partnership v. Paolo Bodo*, 21 USPQ2d 1899 (Comm'r 1990).

Respondent's filing of June 13, 2012, suggests that respondent may have a meritorious defense. See *Regatta Sport Ltd. v. Telux-Pioneer Inc.*, 20 USPQ2d 1154, 1156 (TTAB 1991). Further, there is nothing to suggest that petitioner will suffer prejudice given that the proceeding is in its early stages.¹ However, absent any explanation as to why respondent did not timely file his answer, the Board cannot determine if the circumstances warrant setting aside respondent's default. Accordingly, the Board's determination of whether to enter default judgment in this proceeding is **DEFERRED** and respondent is allowed until March 22, 2013, to 1) explain his earlier failure to timely file an answer or an extension of time to file his answer and to 2) file an answer to the petition for cancellation, failing which judgment by default shall be entered against respondent.

Proceedings herein are otherwise **SUSPENDED**.

Pro Se Information

The record does not reflect that respondent is represented by legal counsel in this proceeding. While Patent and

¹ Moreover, any possible prejudice to petitioner may be obviated by extending the disclosure and discovery dates.

Cancellation No. 92055394

Trademark Rule 11.14(e) permits any person to represent itself, it is generally advisable for a person who is not acquainted with the technicalities of the procedural and substantive law involved in a cancellation proceeding to secure the services of an attorney who is familiar with such matters. The Patent and Trademark Office cannot aid in the selection of an attorney.

The Trademark Rules of Practice, other federal regulations governing practice before the Patent and Trademark Office, and many of the Federal Rules of Civil Procedure govern the conduct of this proceeding. The Trademark Act, the Trademark Rules of Practice, and the Trademark Trial and Appeal Board Manual of Procedure (TBMP) are all available on the TTAB page of the USPTO website at <http://www.uspto.gov/trademarks/process/appeal/index.jsp>. This web page also includes information on Alternative Dispute Resolution (ADR), Frequently Asked Questions about Board proceedings, and other relevant topics.

Respondent is reminded that Trademark Rules 2.119(a) and (b) require that every paper filed in the Patent and Trademark Office in a proceeding before the Board must be served upon the attorney for the other party (or adversary), and proof of such service must be made before the paper will be considered by the Board. Consequently, copies of all papers that the parties may subsequently file in this proceeding must be accompanied by "proof of service" of a copy on the other party or the other party's counsel.

Cancellation No. 92055394

"Proof of service" usually consists of a signed, dated statement stating: (1) the nature of the paper being served, (2) the method of service (e.g., first class mail), (3) the person being served and the address used to effect service, and (4) the date of service. For future reference, a suggested format for the certificate of service is provided below:

I hereby certify that a true and complete copy of the foregoing (*insert title of submission*) has been served on (*insert name of opposing counsel or party*) by mailing said copy on (*insert date of mailing*), via First Class Mail, postage prepaid (*or insert other appropriate method of delivery*) to:

*(set out name and address of
opposing counsel or party)*

Signature

See TBMP § 113 (3d ed. rev. 2012).

Respondent should further note that any paper he is required to file with the Board should not take the form of a letter; proper format should be utilized. The form of submissions is governed by Trademark Rule 2.126. See also TBMP § 106.03 (3d ed. rev. 2012). In particular, "[a] paper submission must be printed in at least 11-point type and double-spaced, with the text on one side only of each sheet" and text "in an electronic submission must be in at least 11-point type and double-spaced." Trademark Rule 2.126(a)(1) and 2.126(b).

While it is true that the law favors judgments on the merits wherever possible, it is also true that the Patent and Trademark Office is justified in enforcing its procedural deadlines. *Hewlett-Packard v. Olympus*, 18 USPQ2d 1710 (Fed. Cir. 1991). In that regard, the parties should note that any paper they are required to file herein must be received by the Board by the due date, unless one of the filing procedures set forth in Trademark Rules 2.197 and 2.198 is utilized.

In submitting an answer, respondent is referred to Rule 8(b) of the Federal Rules of Civil Procedure, made applicable to this proceeding by Trademark Rule 2.116(a). Fed. R. Civ. P. 8(b) provides:

(b) **Defenses; Admissions and Denials**

- (1) **In General.** In responding to a pleading, a party must:
 - (A) state in short and plain terms its defenses to each claim asserted against it; and
 - (B) admit or deny the allegations asserted against it by an opposing party.
- (2) **Denials - Responding to the Substance.** A denial must fairly respond to the substance of the allegation.
- (3) **General and Specific Denials.** A party that intends in good faith to deny all the allegations of a pleading - including the jurisdictional grounds - may do so by a general denial. A party that does not intend to deny all the allegations must either specifically deny designated allegations or generally deny all except those specifically admitted.
- (4) **Denying Part of an Allegation.** A party that intends in good faith to deny only part of an allegation must admit the part that is true and deny the rest.

- (5) **Lacking Knowledge or Information.** A party that lacks knowledge or information sufficient to form a belief about the truth of an allegation must so state, and the statement has the effect of a denial.
- (6) **Effect of Failing to Deny.** An allegation - other than one relating to the amount of damages - is admitted if a responsive pleading is required and the allegation is not denied. If a responsive pleading is not required, an allegation is considered denied or avoided.

The petition for cancellation filed by petitioner herein consists of 33 numbered paragraphs setting forth the basis of petitioner's claim of damage, and a prayer for relief. In accordance with Fed. R. Civ. P. 8(b), it is incumbent on respondent to answer the petition for cancellation by admitting or denying the allegations contained in each paragraph. If respondent is without sufficient knowledge or information on which to form a belief as to the truth of any one of the allegations, it should so state and this will have the effect of a denial.

Files of TTAB proceedings can be examined using TTABVue, accessible at <http://ttabvue.uspto.gov/ttabvue>. After entering the 8-digit proceeding number, click on any entry in the prosecution history to view that paper in PDF format.

* * *

RESPONSE TO 33 ALLIGATIONS

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>

ESTTA Tracking number: **ESTTA464131**

Filing date: **03/27/2012**

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

Petition for Cancellation

Notice is hereby given that the following party requests to cancel indicated registration.

Petitioner Information

Name	Marc Eberle		
Entity	Individual	Citizenship	UNITED STATES
Address	1655 N. Glassell Street Orange, CA 92807 UNITED STATES		

Attorney information	Caroline Wong 1580 West El Camino Real Mountain View, CA 94040 UNITED STATES trademarks@rajpatent.com Phone:650-390-6445		
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Registration Subject to Cancellation

Registration No	3944136	Registration date	04/12/2011
Registrant	Stevie Soto 2345 N Tustin Street Orange, CA 92865 UNITED STATES		

Goods/Services Subject to Cancellation

Class 044. First Use: 2007/04/00 First Use In Commerce: 2007/04/00
All goods and services in the class are cancelled, namely: Body piercing services; Tattooing services

Grounds for Cancellation

<i>Torres v. Cantine Torresella S.r.l.Fraud</i>	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)
Priority and likelihood of confusion	Trademark Act section 2(d)

Mark Cited by Petitioner as Basis for Cancellation

U.S. Application No.	85512242	Application Date	01/09/2012
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	GOODFELLAS TATTOO		

Design Mark	GOODFELLAS TATTOO
Description of Mark	NONE
Goods/Services	Class 044. First use: First Use: 1998/12/31 First Use In Commerce: 1998/12/31 Body piercing services; Cosmetic tattooing services; Tattoo parlors; Tattoo studios

Attachments	85512242#TMSN.jpeg (1 page)(bytes) PETITION.pdf (38 pages)(8347815 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Caroline Wong/
Name	Caroline Wong
Date	03/27/2012

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

In the matter of Trademark Registration No. 3944136
For the mark GOODFELLAS TATTOO Registered on April 12, 2011

Marc Eberle Petitioner Vs Stevie Soto Registrant	MARK: GOODFELLAS TATTOO Reg. No. 3944136
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PETITION TO CANCEL

Marc Eberle (“Petitioner”) hereby petitions to cancel Registration No. 3944136 in International Class 044 owned by Stevie Soto, (“Registrant”). The description of services for Registrant’s mark is “body piercing services; tattooing services.” Petitioner believes it is damaged by the continued registration of Registration No. 3944136 (“Registration”).

As grounds for the cancellation, Petitioner alleges as follows:

FACTS COMMON TO ALL CLAIMS

1. Petitioner is an individual domiciled in California, United States, with a principal place of business at 1655 North Glassell Avenue, Orange, California 92867. **TRUE**

2. Petitioner is the owner of the pending United States trademark application for the standard character mark GOODFELLAS TATTOO (US Serial No. 85/512,242) for "body piercing services; tattoo services" in International Class 044 ("Application"). A TARR printout relating to the Application is attached as Exhibit A. The Application is live and pending. TRUE

3. Upon information and belief, Registrant is an individual domiciled in California, United States, with a principal place of business at 2345 North Tustin Street, Orange, California 92865. TRUE

4. Registrant is currently the owner of United States Trademark Registration No. 3944136, [REDACTED] for the mark GOODFELLAS TATTOO, for "body piercing services; tattooing services" in International Class 044 ("Registration"). This mark was registered on April 12, 2011. A TARR printout relating to the Registration is attached as Exhibit B. TRUE

5. On or about 1998, Sean Hannam, an individual (not a party in this action), started a business under GOODFELLA'S TATTOO LOUNGE located on 1655 North Glassell Avenue, Orange, California 92867. UNKNOWN - NO DOCUMENTATION PROVIDED

6. On or about April 1, 2003 Petitioner purchased from Sean Hannam the GOODFELLA'S TATTOO LOUNGE ("Business") for body piercing and tattooing services, located on 1655 North Glassell Avenue, Orange, California 92867, including all rights to use the name. UNKNOWN NO DOCUMENTATION PROVIDED

7. On or about January 2005, Registrant was hired by Petitioner as a tattoo artist and shop manager at Business. UNKNOWN NO DOCUMENTATION ATTACHED

8. On February 7, 2007, Registrant and Petitioner signed a lease agreement at 2345 and 2347 North Tustin Avenue for GOOD FELLAS TATTOO ART & DESIGN STUDIO. The lease agreement is attached as Exhibit C. TRUE

9. On August 12, 2010, Registrant filed a U.S. Federal Trademark application for a designmark GOODFELLAS TATTOO for "body piercing services; tattooing services" under Registrant's name. Petitioner was unaware of and did not consent to the trademark filing.

TRUE
TRADEMARK LOGO IS REGISTRANT'S
INTELLECTUAL PROPERTY
UNKNOWN

10. On or about August 2011 Petitioner found out about the Registration.

11. Petitioner will be damaged by the registration of the subject registration because that registration is blocking Petitioner's pending Application, US Serial No. 85/512,242.

FALSE
REGISTRANT WILL BE DAMAGED

COUNT I -

PRIORITY/LIKELIHOOD OF CONFUSION

12. Petitioner repeats and realleges the allegations of the preceding Paragraphs as fully set forth herein.

FALSE

13. Petitioner has been using the trademark GOODFELLAS TATTOO in connection with body piercing and tattooing services since as early as April 20, 2003.

FALSE THE NAME

14. On April 20, 2003, Petitioner filed a fictitious business name statement under "Good Fella's Tattoo Lounge" with the Orange County Clerk. The record is attached as Exhibit D.

TRUE

15. On information and belief, Registrant has not filed a fictitious business name statement under "GOODFELLAS TATTOO" to the date of the filing of this complaint.

16. On or about May 12, 2003 Petitioner registered the domain name "GoodfellasTattoo.com" wherein Petitioner launched a live website to promote body piercing and tattoo services.

UNKNOWN NO DOCUMENTS
PROVIDED
BUT PETITIONER DOES OWN DOMAIN

17. Petitioner has expended considerable time, effort, and financial resources building and marketing the GOODFELLAS TATTOO brand. As a result thereof, the GOODFELLAS TATTOO mark and the goodwill associated therewith are of inestimable value to Petitioner.

FALSE
REGISTRANT HAS DOCUMENTATION
+ PUBLICATIONS PROVIDED
PRIOR

18. Registrant's trademark registration (Registration No. 3944136) cites April 1, 2007 as the date of first use of registrant's mark anywhere and April 1, 2007 as the date of first use of

registrant's mark in commerce for body piercing services and tattooing services.

TRUE THATS WHEN REGISTRANT DESIGNED THE LOGO.

19. Petitioner has been using the GOODFELLAS TATTOO mark in commerce in relation to body piercing and tattooing services for a longer period of time and prior to Registrant's use of

GOODFELLAS TATTOO under International Class 044 for "body piercing services; tattooing services."

POSSIBLY, REGISTRANT IS ASSOCIATED IN THE INDUSTRY BY THE TRADEMARK PETITIONER IS NOT

20. Registrant's registration and use of the GOODFELLAS TATTOO mark, in view of

Petitioner's rights in the GOODFELLAS TATTOO mark, is likely to cause confusion, to cause mistake or to deceive.

FALSE - STEVE SOTO REGISTRANT CAN NOT BE CONFUSED WITH PETITIONER. REGISTRANT IS AN INTERNATIONALLY FAMOUS AWARD WINNING TATTOO ARTIST WITH 350+ AWARDS. PETITIONER IS AN UNKNOWN BUSINESS OWNER

21. On October 14, 2011 Registrant offered to purchase the "GoodfellasTattoo.com" domain from Petitioner for an undisclosed sum, wherein Registrant acknowledged the mark would create confusion.

22. On information and belief, Registrant was well aware of Petitioner's GOODFELLAS TATTOO mark prior to filing Registration No. 3944136, and selected the GOODFELLAS

TATTOO mark with the specific intent to create confusion.

FALSE ASSOCIATION WITH GOODFELLAS TATTOO IS DIRECTLY ASSOCIATED WITH STEVE SOTO TATTOO ARTIST (REGISTRANT) NOT MARK EBERLE (PETITIONER)

23. Accordingly, it is Petitioner's belief that if Registrant is allowed to maintain registration for the petitioned mark herein, Petitioner will suffer irreparable harm and damage.

FALSE REGISTRANT WILL SUFFER IRREPARABLE HARM

COUNT II -

FRAUD IN THE USPTO

24. Petitioner repeats and realleges the allegations of the preceding Paragraphs as if fully set forth herein.

THE ALLEGATIONS ARE FALSE AS SHOWN ABOVE.

25. On August 12, 2011, in the application for Registrant's registration, Registrant knowingly made a false and fraudulent statement and declaration in Registrant's application wherein Registrant falsely claimed, "he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause." FALSE

26. At the time Registrant made the statement referred to above, Registrant knew of Petitioner's rights to the GOODFELLAS mark in connection with "body piercing services; tattooing services" as alleged herein. UNKNOWN - NO DOCUMENTATION PROVIDED

27. The false and fraudulent declaration referred to above with respect to Registrant's GOODFELLAS TATTOO mark was made by Registrant with actual knowledge of its falsity, and was not made on information and belief and was made by a person or entity who knew or should have known the same was false and fraudulent. FALSE

28. Registrant knowingly made a false, material misrepresentation of fact in connection with Registrant's Registration when it made the false and fraudulent declaration referred to above. FALSE

29. The false and fraudulent declaration referred to above with respect to Registrant's mark GOODFELLAS TATTOO was made with the intent to deceive the USPTO and that the USPTO rely upon the same. FALSE

30. The USPTO did rely on the false and fraudulent declaration when it acknowledged the filing of the application and allowed Registrant's mark to register. FALSE

31. As a result, Registrant willfully and knowingly perpetrated a fraud for Registrant's mark on the United States Patent and Trademark Office. FALSE

32. Registrant is not entitled to registration of Registrant's Mark because they knowingly committed fraud when the original application was filed. FALSE

33. Had it been aware of the false and fraudulent declaration referred to above and of Registrant's knowingly fraudulent acts, the USPTO would not have accepted the filing of the application, nor allowed Registrant's mark to register. FALSE

WHEREFORE, Petitioner believes that it is and will be damaged by Registrant's Mark and hereby prays that Registrant's Mark be canceled and that this Petition for Cancellation be sustained in favor of Petitioner.

FALSE PETITIONER IMPLIED CONSENT AND SIGNED LEASE KNOWING BY VERBAL AGREEMENT THAT REGISTRANT WAS USING NAME

Petitioner has submitted its payment for this Petition to Cancel previously through electronic means.

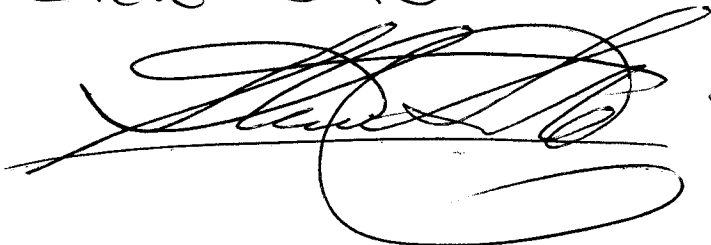
Date: March 27, 2012

Respectfully submitted,

RAJ ABHYANKER, P.C.

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STEVE SOTO



5/22/2013