

ESTTA Tracking number: **ESTTA772324**

Filing date: **09/22/2016**

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

Proceeding	92064210
Party	Plaintiff Securawealth Investment Strategies, LLC
Correspondence Address	FRED ZOLLINGER ZOLLINGER & BURLESON LTD 6370 MT PLEASANT STREET NW, PO BOX 2368 NORTH CANTON, OH 44720 UNITED STATES docket@patentlawyerz.com
Submission	Motion for Default Judgment
Filer's Name	Fred H. Zollinger III
Filer's e-mail	docket@patentlawyerz.com
Signature	/fhziii/
Date	09/22/2016
Attachments	20160922 Motion for Default Judgment.pdf(29640 bytes)

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

Securawealth Investment Strategies, LLC,

Petitioner,

v.

Secure Wealth, LLC

Respondent.

Cancellation No. 92064210

Registration No. 4212958

Interlocutory Attorney: Robert Coggins

Tyrone Craven, Lead Paralegal Specialist

Paralegal Name: Lalita Greene

MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER

Petitioner Securawealth Investment Strategies, by and through its attorney of record, hereby moves for the entrance of a judgment of default for Respondent's failure to timely answer the petition for Cancellation.

BRIEF IN SUPPORT OF MOTION

In support of Petitioner's motion hereof, Petitioner hereby submits the following:

1. Petition for Cancellation setting forth the grounds therefore was filed on behalf of petitioner on August 9, 2016, and Notice of Ineffective Service was filed August 15, 2016.

2. The Petition was assigned Cancellation No. 92064210, and a schedule of proceedings in accordance with the Trademark Rules of Practice was duly sent to the Petitioner and Respondent at their service addresses on August 12, 2016. The service on respondent was undeliverable at the service address.

3. Said notice provided that an Answer was due September 21, 2016.

4. As of the date of this submission, no Answer has been filed with the Trademark Trial and Appeal Board or served upon Petitioner.

5. Petitioner is entitled to a judgment by default.

WHEREFORE, for the foregoing reasons, and for the reasons set forth in the Petition for Cancellation, Petitioner respectfully requests that this Motion for Default Judgment and the Petition for Cancellation of Registration 4212958 be GRANTED.

Respectfully submitted,

Zollinger & Burleson Ltd.

Dated: September 22, 2016



By: _____

Fred H. Zollinger III

6370 Mt. Pleasant Street NW

North Canton, OH 44720

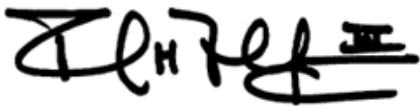
330-526-0104

docket@patentlawyerz.com

CERTIFICATE OF SERVICE

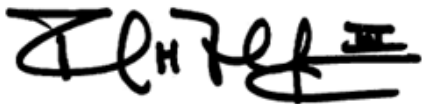
I hereby certify that I served a copy of the foregoing NOTICE OF FAILURE OF SERVICE upon Respondent by depositing one copy thereof in the United States Mail, first class postage paid, on September 22, 2016, addressed as follows:

Secure Wealth, LLC
Registered Agent: David Wright
Suite 1025
136 East South Temple
Salt Lake City, Utah 84111



Fred H. Zollinger III

I hereby certify that this correspondence is being electronically filed with the Trademark Trial and Appeal Board of the U.S. Patent and Trademark Office through their web site located at <http://esta.uspto.gov>. on September 22, 2016.



Fred H. Zollinger III