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Filing date: **02/14/2017**

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

Proceeding	92064447
Party	Plaintiff Cannei, LLC
Correspondence Address	BREE POPP 16537 E LASER DRIVE, SUITE 10 FOUNTAIN HILLS, AZ 85268 UNITED STATES bpopp@setgame.com, admin@setgame.com
Submission	Motion for Default Judgment
Filer's Name	Bree Popp
Filer's e-mail	bpopp@setgame.com, admin@setgame.com
Signature	/Bree Popp/
Date	02/14/2017
Attachments	2017-02-14 - Motion for Default Judgment - Signed.pdf(738922 bytes)

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

CANNEI, LLC,

Petitioner

v.

NINJAI GANG, LLC,

Respondent

Registration No. 2552951

Mark: KARMA KOP

Issued: March 26, 2002

Cancellation No. 92064447

MOTION FOR DEFAULT JUDGMENT FOR FAILURE TO ANSWER

Pursuant to 37 CFR §2.114(b), TBMP §312.01 and §508 and Fed. R. Civ. P. 55(b), Cannei, LLC (“Petitioner”), hereby moves for the entrance of a judgment of default for Ninjai Gang, LLC’s (“Respondent”) failure to timely answer the Amended Petition for Cancellation.

BRIEF IN SUPPORT OF MOTION

1. On December 12, 2016 Petitioner filed an Amended Petition for Cancellation (the “Amended Petition”) in this proceeding.
2. On December 12, 2016 Petitioner sent a copy of the Amended Petition via USPS Priority Mail 3-Day to Respondent’s Attorney:

Katherine L. McDaniel, Esq.
Fulwider Patton LLP
6100 Center Drive, Suite 1200
Los Angeles, CA 90045

tracking number 9410809898642509346702

3. On December 15, 2016, the service copy of the Amended Petition was delivered to Respondent’s Attorney, Katherine L. McDaniel.
4. On January 17, 2017, the Trademark Trial and Appeal Board (the “Board”) accepted as a matter of course the Amended Petition as the operative complaint in this proceeding.

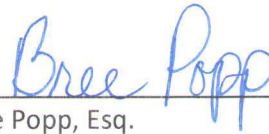
5. The Board's January 17, 2017 notice provided, among other matters, that Respondent's answer was due by February 12, 2017.

6. As of February 14, 2017, no answer in this matter has been filed or served upon Petitioner. Nor has Respondent filed a motion to extend its time to answer.

WHEREFORE, for all the foregoing reasons and all the reasons set forth in the Petition for Cancellation, Petitioner respectfully requests that this Motion for Default Judgment and the Amended Petition for Cancellation of Registration No. 2552951 be GRANTED.

Dated: 2/14/17

Respectfully submitted,

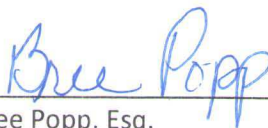


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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2017 this Motion for Default Judgment was electronically filed with the Trademark Trial and Appeal Board through their website located at <http://estta.uspto.gov>.

I hereby certify that a true and complete copy of the foregoing Motion for Default Judgment has been served on Ninjai Gang, LLC by emailing said copy to Respondent's attorney at kmcdaniel@fulpat.com and DocketLA@fulpat.com on February 14, 2017.



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