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

Proceeding	92075387
Party	Plaintiff Bo Zhang
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Date	11/20/2020
Attachments	Pet. to cancel_nanoPen.pdf(37470 bytes)

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

In re Trademark Registration Nos. 5534484 and 5534485)	
)	
Mark: L1S1QI)	
)	
Registration Date: Aug. 07, 2018)	
)	
Mr. Bo Zhang)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92075387
)	
Shenzhen Shiji Chuangteng E-commerce Co., Ltd.)	
)	
Registrant.)	
)	

**MOTION FOR ENTRY OF DEFAULT JUDGMENT FOR RESPONDENT’S
FAILURE TO ANSWER PETITION FOR CANCELLATION**

Petitioner Bo Zhang (“Petitioner”) respectfully submits this Motion for Entry of Default Judgment for Respondent-Registrant Shenzhen Shiji Chuangteng E-commerce Co., Ltd.’s failure to file and serve its Answer to this Petition for Cancellation of the above-identified U.S. trademark registrations.

FACTUAL BACKGROUND

1. On October 2, 2020, the Petitioner file a petition to cancel trademark registration nos. 5534484 and 5534485.

2. On October 5, 2020, this Board ordered Respondent-Registrant to file a responsive by November 14, 2020.
3. As of today, November 19, 2020, Respondent-Registrant has not filed the required responsive pleading.

LEGAL STANDARD

TBMP Rule 312.01 prescribes as follows:

37 CFR § 2.106(a) If no answer is filed within the time initially set, or as may later be reset by the Board, the opposition may be decided as in case of default. The failure to file a timely answer tolls all deadlines, including the discovery conference, until the issue of default is resolved.

Further, under TBMP Rule 508 prescribes as follows:

If a defendant fails to file an answer to a complaint during the time allowed therefor, the Board, on its own initiative, may issue a notice of default allowing the defendant time to show cause why default judgment should not be entered against it. If the defendant fails to file a response to the notice, or files a response that does not show good cause, default judgment may be entered against it.

CONCLUSION

Therefore, the time allowed by the Board for answering having expired, Petitioner hereby moves for entry of Default Judgment against Respondent-Registrant Shenzhen Shiji Chuangteng E-commerce Co., Ltd.

Dated: November 19, 2020

Respectfully submitted,

By: / Zheng Liu /
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document

MOTION FOR ENTRY OF DEFAULT JUDGMENT FOR RESPONDENT'S FAILURE TO ANSWER PETITION FOR CANCELLATION

is being served upon Registrant by mailing a true copy thereof by first class mail, postage prepaid, addressed to:

Owner address:
Shenzhen Shiji Chuangteng E-commerce Co.,Ltd.
702,No.4 Alley,Dafapu East Vil.,
Bantian St.,Longgang,
Shenzhen CHINA 518116

Correspondent address:
WANG YIQIANG
LONG HUA XIN QU
WEI DONG LONG KE JI DA SHA 1331-1332
SHENZHEN,GUANGDONG CHINA 518109

November 19, 2020

/Bo Zhang/

Bo Zhang