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

Proceeding no.	91269854
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Submission	Motion for Summary Judgment Yes , the Filer previously made its initial disclosures pursuant to Trademark Rule 2.120(a); OR the motion for summary judgment is based on claim or issue preclusion, or lack of jurisdiction. The deadline for pretrial disclosures for the first testimony period as originally set or reset: 12/15/2022
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Attachments	Mishimoto Motion for Summary Judgment.pdf(728033 bytes) Declaration of Melanie A. Miller.pdf(193338 bytes) Exhibit A.pdf(163779 bytes) Exhibit B.pdf(3142930 bytes) Exhibit C.pdf(3057532 bytes) Exhibit D.pdf(2865393 bytes) Exhibit E.pdf(113386 bytes) Exhibit F.pdf(236340 bytes) EXHIBIT G - UNDER SEAL SLIP SHEET.pdf(82923 bytes) Exhibit H.pdf(351793 bytes)

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

RESOURCE INTL, INC.,)	
D/B/A MISHIMOTO)	
Opposer,)	Opposition No.: 91269854
v.)	Serial No.: 88/488,449
DYNOJET RESEARCH, INC.)	Mark: PUSH THE LIMIT
Applicant.)	
)	

**OPPOSER RESOURCE INTL, INC., D/B/A MISHIMOTO’S MEMORANDUM
OF LAW IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and §528.01 of the Trademark Board Manual of Procedure (“TBMP”), Opposer, Resource Intl, Inc., d/b/a Mishimoto (“Mishimoto”), by its attorneys, submits the following Memorandum of Law in Support of its Motion for Summary Judgment, which motion (“Motion”) is being filed simultaneously herewith. As there is no factual dispute that Applicant, Dynojet Research, Inc.’s (“Dynojet”) PUSH THE LIMIT Designation is likely to be confused with Mishimoto’s PUSH THE LIMITS trademarks, Mishimoto respectfully requests that the Trademark Trial and Appeal Board (“Board”) grant its Motion in its entirety.

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