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Filing date: **10/16/2013**

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

Proceeding	91204150
Party	Defendant Campus Crusade for Christ, Inc. aka Campus Crusade for Christ International, Campus Crusade for Christ, Campus Crusade, CCCI
Correspondence Address	DENNIS R KASPER CAMPUS CRUSADE FOR CHRIST INC 100 LAKE HART DR 3500 , ATTN GENERAL COUNSELS OFFICE IP TEAM ORLANDO, FL 32832 0100 UNITED STATES gco.ip@cru.org, laura.sherwood@cru.org
Submission	Motion to Amend Application
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2 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
3

4 UNIVERSITY OF MARY HARDIN BAYLOR,) Opposition No.: 91204150
5)
6 Opposer,) Application S.N.: 85/20034
7)
8 vs.)
9)
10 CAMPUS CRUSADE FOR CHRIST, INC.,)
11)
12 Applicant)
13)
14)

15 **APPLICANT'S CONSENTED MOTION TO AMEND ITS APPLICATION**
16

17 Pursuant to 37 C.F.R. §2.133 and §514 of the Trademark Board Manual of
18 Procedures, Applicant, CAMPUS CRUSADE FOR CHRIST, INC. ("Applicant"), through
19 its attorneys, hereby respectfully moves the Board to amend the opposed
20 application at issue in the instant case for the mark CRU, Application Serial
21 Number 85/200344 ("Application"), specifically the identification of goods
22 and services contained therein. Applicant submits this motion with the
23 consent of the Opposer, UNIVERSITY OF MARY HARDIN-BAYLOR ("Opposer"), such
24 consent given to Applicant in writing as of October 15, 2013, as well as
25 pursuant to that certain executed Co-Existence and Settlement Agreement
26 between Opposer and Applicant with an effective date of September 12, 2013
27 ("UMHB-CCCI Agreement").

28 Applicant requests the following changes to Application in Class 16
(proposed language for deletion stricken through and proposed new language
underlined in the redline version):

Paper goods and printed matter, namely, books, pamphlets, booklets,
~~notebooks,~~ newspapers, brochures, leaflets, magazines, newsletters,
bookmarks, training manuals, printed teaching materials and

1 instructional guides, featuring and dealing with religion, spiritual,
2 cultural, and religious issues and values, achieving personal spiritual
3 growth, developing character, and building and strengthening
4 relationships

5 Such changes above shall amend Class 16 identification of goods to
6 state:

7 Paper goods and printed matter, namely, books, pamphlets, booklets,
8 newspapers, brochures, leaflets, magazines, newsletters, bookmarks,
9 training manuals, printed teaching materials and instructional guides,
10 featuring and dealing with religion, spiritual, cultural, and religious
11 issues and values, achieving personal spiritual growth, developing
12 character, and building and strengthening relationships

13 Applicant requests the following changes to Application in Class 35
14 (proposed language for deletion stricken through and proposed new language
15 underlined in the redline version):

16 On-line retail store featuring books, CDs, DVDs, and other materials
17 featuring and dealing with religion, spiritual, cultural, and religious
18 issues and values, achieving personal spiritual growth, developing
19 character, and developing and strengthening relationships; charitable
20 services, namely, organizing and conducting volunteer programs,
21 community service projects, and short-term missionary projects in the
22 fields of disaster relief to benefit suffering people and victims of
23 natural disasters, to increase support and morale of members of the
24 U.S. military, and promote public awareness of poverty; charitable
25 services, namely, coordination of the procurement and distribution of
26 food and clothing donations from others, specifically individuals,
27 religious institutions, manufacturers, wholesalers, and retailers to
28 benefit suffering people, victims of natural disasters, and the needy;

1 developing and co-coordinating volunteer projects for charitable
2 organizations, all of the foregoing provided by an international faith-
3 based mission and relief organization and none of the foregoing
4 provided by a university or college

5 Such changes above shall amend Class 35 identification of services to
6 state:

7 On-line retail store featuring books, CDs, DVDs, and other materials
8 featuring and dealing with religion, spiritual, cultural, and religious
9 issues and values, achieving personal spiritual growth, developing
10 character, and developing and strengthening relationships; charitable
11 services, namely, organizing and conducting volunteer programs,
12 community service projects, and short-term missionary projects in the
13 fields of disaster relief to benefit suffering people and victims of
14 natural disasters, to increase support and morale of members of the
15 U.S. military, and promote public awareness of poverty; charitable
16 services, namely, coordination of the procurement and distribution of
17 food and clothing donations from others, specifically individuals,
18 religious institutions, manufacturers, wholesalers, and retailers to
19 benefit suffering people, victims of natural disasters, and the needy;
20 developing and co-coordinating volunteer projects for charitable
21 organizations, all of the foregoing provided by an international faith-
22 based mission and relief organization and none of the foregoing
23 provided by a university or college

24 Applicant requests the following changes to Application in Class 38
25 (proposed language for deletion stricken through and proposed new language
26 underlined in the redline version):

27 Streaming of audio and video material on the Internet, featuring and
28 dealing with religion, spiritual, cultural, and religious issues and

1 values, achieving personal spiritual growth, developing character, and
2 developing and strengthening relationships; providing on-line forums
3 for transmission of messages among computer users featuring and dealing
4 with religion, spiritual, cultural, and religious issues and values,
5 achieving personal spiritual growth, developing character, and
6 developing and strengthening relationships, all of the foregoing
7 provided by an international faith-based mission and relief
8 organization and none of the foregoing provided by a university or
9 college

10 Such changes above shall amend Class 38 identification of services to
11 state:

12 Streaming of audio and video material on the Internet, featuring and
13 dealing with religion, spiritual, cultural, and religious issues and
14 values, achieving personal spiritual growth, developing character, and
15 developing and strengthening relationships; providing on-line forums
16 for transmission of messages among computer users featuring and dealing
17 with religion, spiritual, cultural, and religious issues and values,
18 achieving personal spiritual growth, developing character, and
19 developing and strengthening relationships, all of the foregoing
20 provided by an international faith-based mission and relief
21 organization and none of the foregoing provided by a university or
22 college

23 Applicant requests the following changes to Application in Class 41
24 (proposed language for deletion stricken through and proposed new language
25 underlined in the redline version):

26 Educational services, namely, conducting seminars, conferences not
27 relating to business, workshops, and weekly meetings not relating to
28 business in the fields of religion, spiritual, cultural, and religious

1 issues and values, achieving personal spiritual growth, developing
2 character, and developing and strengthening relationships, and
3 distribution of course materials in connection therewith, none of the
4 foregoing for undergraduate credit; educational services, namely,
5 providing educational materials on-line and via email, namely,
6 articles, newsletters, manuals, and documents featuring and dealing
7 with religion, spiritual, cultural, and religious issues and values,
8 achieving personal spiritual growth, developing character, and
9 developing and strengthening relationships; educational services,
10 namely, providing instruction, none of the foregoing for undergraduate
11 credit, in the fields of religion, spiritual, cultural, and religious
12 issues and values, achieving personal spiritual growth, developing
13 character, and developing and strengthening relationships via a global
14 computer network; entertainment services, namely, continuing
15 biblically-based programs about religion, spiritual, cultural, and
16 religious issues and values, achieving personal spiritual growth,
17 developing character, and developing and strengthening relationships
18 provided through radio broadcasts, all of the foregoing provided by an
19 international faith-based mission and relief organization and none
20 of the foregoing provided by a university or college

21 Such changes above shall amend Class 41 identification of services to state:

22 Educational services, namely, conducting seminars, conferences not
23 relating to business, workshops, and weekly meetings not relating to
24 business in the fields of religion, spiritual, cultural, and religious
25 issues and values, achieving personal spiritual growth, developing
26 character, and developing and strengthening relationships, and
27 distribution of course materials in connection therewith, none of the
28 foregoing for undergraduate credit; educational services, namely,

1 providing educational materials on-line and via email, namely,
2 articles, newsletters, manuals, and documents featuring and dealing
3 with religion, spiritual, cultural, and religious issues and values,
4 achieving personal spiritual growth, developing character, and
5 developing and strengthening relationships; educational services,
6 namely, providing instruction, none of the foregoing for undergraduate
7 credit, in the fields of religion, spiritual, cultural, and religious
8 issues and values, achieving personal spiritual growth, developing
9 character, and developing and strengthening relationships via a global
10 computer network; entertainment services, namely, continuing
11 biblically-based programs about religion, spiritual, cultural, and
12 religious issues and values, achieving personal spiritual growth,
13 developing character, and developing and strengthening relationships
14 provided through radio broadcasts, all of the foregoing provided by an
15 international faith-based mission and relief organization and none
16 of the foregoing provided by a university or college

17 Applicant requests the following changes to Application in Class 45
18 (proposed language for deletion stricken through and proposed new language
19 underlined in the redline version):

20 Evangelistic and Christian ministerial services directed towards
21 college students; religious services, namely, providing ministerial,
22 missionary, evangelical and coaching services featuring and dealing
23 with religion, spiritual, cultural, and religious issues and values,
24 achieving personal spiritual growth, developing character, and
25 developing and strengthening relationships; evangelistic and
26 ministerial services, namely, conducting spiritual retreats that assist
27 individuals in achieving spiritual growth, developing character, and
28 developing and strengthening relationships; providing information in

1 the fields of religion, spiritual, and religious issues and values,
2 achieving personal spiritual growth, developing character, and
3 developing and strengthening relationships via a global computer
4 network, all of the foregoing provided by an international faith-based
5 mission and relief organization and none of the foregoing provided by a
6 university or college

7 Such changes above shall amend Class 45 identification of services to
8 state:

9 Evangelistic and Christian ministerial services directed towards
10 college students; religious services, namely, providing ministerial,
11 missionary, evangelical and counseling services featuring and dealing
12 with religion, spiritual, cultural, and religious issues and values,
13 achieving personal spiritual growth, developing character, and
14 developing and strengthening relationships; evangelistic and
15 ministerial services, namely, conducting spiritual retreats that assist
16 individuals in achieving spiritual growth, developing character, and
17 developing and strengthening relationships; providing information in
18 the fields of religion, spiritual, and religious issues and values,
19 achieving personal spiritual growth, developing character, and
20 developing and strengthening relationships via a global computer
21 network, all of the foregoing provided by an international faith-based
22 mission and relief organization and none of the foregoing provided by a
23 university or college

24 As grounds for this motion, Applicant states that the above-proposed
25 amendments are required for CCCI's compliance with the terms of the executed
26 UMHB-CCCI Agreement.

27 The Applicant and Opposer have each engaged in longstanding use of CRU
28 as a trademark and both parties agree that they can continue to co-exist and

1 each use and register their respective trademarks without causing a
2 likelihood of confusion in the marketplace as long as each party complies
3 with the terms of the UMHB-CCCI Agreement. In the UMHB-CCCI Agreement, the
4 Applicant and Opposer developed descriptions of goods and services that
5 accurately convey the goods and services that are offered by both parties and
6 that are acceptable to the other party. The above-proposed amended language
7 accurately conveys those goods and services that Applicant offers and/or
8 intends to offer in conjunction with the mark CRU, which is the subject of
9 the Application at issue in the matter, and tracks the acceptable language
10 set forth in the UMHB-CCCI Agreement. Additionally, Opposer has provided
11 consent for the above-proposed amendments as of October 15, 2013.

12 Moreover, and in compliance with 37 C.F.R. §2.71(a), the proposed
13 amendments serve to clarify and limit but in no way broaden the
14 identification of goods and services.

15 Based on the foregoing, Applicant requests the Board to grant
16 Applicant's present motion under 37 C.F.R. §2.133 and amend the opposed
17 Application in the manner described above.

18 Respectfully submitted,

19 CAMPUS CRUSADE FOR CHRIST, INC.

20 Dated: October 16, 2013



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CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury that a true and correct copy of the following document:

Applicant's Consented Motion to Amend Its Application

has been served upon the following counsel, direct to said counsel at the following address and in the below manner:

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Dated: October 16, 2013



Patricia M. Beeber
Campus Crusade for Christ, Inc.