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Filing date: **01/05/2016**

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

Proceeding	91214700
Party	Defendant Premier Accessory Group, LLC
Correspondence Address	BRIAN A BLOOM MORITT HOCK & HAMROFF LLP 400 GARDEN CITY PLZ 2ND FL GARDEN CITY, NY 11530 UNITED STATES bbloom@moritthock.com, msarney@moritthock.com
Submission	Response to Board Order/Inquiry
Filer's Name	Michael Sarney
Filer's e-mail	bbloom@moritthock.com, msarney@moritthock.com
Signature	/michael sarney/
Date	01/05/2016
Attachments	Response to Board December 9 Order.pdf(129195 bytes )

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

SPECULATIVE PRODUCT DESIGN, LLC,	)	
DBA SPECK PRODUCTS,	)	
	)	Opposition No. 91214700
Opposer,	)	
	)	Serial No.: 85/602,658
v.	)	Filed: April 19, 2012
	)	Mark: <b>SPEKTRUM</b>
PREMIER ACCESSORY GROUP, LLC,	)	
	)	Published: October 1, 2013
Applicant.	)	

**RESPONSE TO BOARD ORDER**

On November 10, 2015, Applicant filed a proposed amendment to Application Serial No. 85602658, with the consent of Opposer Speculative Products Design, LLC DBA Speck Products.

In response, the Board required that Applicant must also file a consent to the amendment by Horizon Hobby, Inc., the Opposer in Opposition No. 91214867. Accordingly, on November 30, 2015, Applicant filed a motion to amend with the consent of Horizon Hobby, Inc., Opposer in Opposition No. 91214867.

In response, on December 9, 2015, the Board issued an Order stating that the amendments filed on November 10 and November 30 were different, and that Applicant must clarify the discrepancies between the amendments consented to by the respective Opposers.

Accordingly, Applicant submits herewith a further Consent to Amend Application, in which Opposer Speculative Products Design, LLC consents to the same

amendment to the identification of goods as consented to by Horizon Hobby, Inc. This Consent to Amend supersedes the prior proposed amendment on consent filed by Applicant on November 10, 2015.

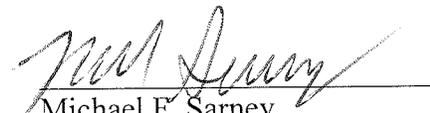
Accordingly, Applicant respectfully requests that the application be amended accordingly.

Dated: January 5, 2016

Respectfully submitted,

MORITT HOCK & HAMROFF LLP  
450 Seventh Avenue  
15<sup>th</sup> Floor  
New York, NY. 10123  
Tel. (212) 239-2000

By:

  
Michael F. Sarney

Brian A. Bloom  
MORITT HOCK & HAMROFF LLP  
400 Garden City Plaza  
Garden City, New York 11530  
Tel: (516) 873-2000

Attorneys for Applicant

**CERTIFICATE OF SERVICE**

I, the undersigned, Michael Sarney, hereby certify that, on the 5<sup>th</sup> day of January, 2016, I caused to be served a true and correct copy of the foregoing

**RESPONSE TO BOARD ORDER**

**by U.S. Mail, first-class**, by depositing the same in a depository of the United States Postal Service, on:

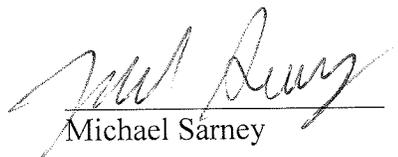
Margarita Wallach  
Gary Fechter  
McCARTER & ENGLISH, LLP  
245 Park Avenue  
27<sup>th</sup> Floor  
New York, N.Y. 10167

Attorneys for Opposer Speculative Products Design, LLC

and

Ryan C. Clark  
Christina L. Brown  
McDONNELL BOEHNEN HULBERT & BERGHOFF LLP  
300 S Wacker Drive, Suite 3100  
Chicago, Illinois 60606

Attorneys for Opposer Horizon Hobby, Inc.

  
Michael Sarney

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

SPECULATIVE PRODUCT DESIGN, LLC,	)	
DBA SPECK PRODUCTS,	)	
	)	Opposition No. 91214700
Opposer,	)	
	)	Serial No.: 85/602,658
v.	)	Filed: April 19, 2012
	)	Mark: <b>SPEKTRUM</b>
PREMIER ACCESSORY GROUP, LLC,	)	
	)	Published: October 1, 2013
Applicant.	)	
	)	

**CONSENT TO AMEND APPLICATION**

Pursuant to Trademark Rule 2.133(a), 37 C.F.R. §2.133(a) and TBMP, Applicant PREMIER ACCESSORY GROUP, LLC, hereby requests – with Opposer's Consent – that the identification of goods for Application Serial No. 85/602,658, for the mark SPEKTRUM, presently the subject of the above-captioned matter pending before the Board, be amended to read as follows:

**Battery chargers, excluding battery chargers for use with remotely controlled vehicles and excluding battery chargers for use with unmanned vehicle systems comprising unmanned vehicles, transmitters, receivers, serial interfaces, servomotor interfaces, and ground side components, namely transmitters, receivers, and display screens; Cell phone battery chargers; Ear buds; Headphones**

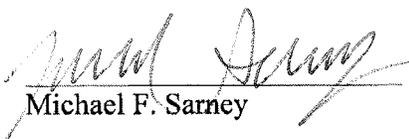
Opposer's counsel has consented to the foregoing amendment to the identification of goods. Further, the parties in the captioned opposition proceeding have agreed to resolve the opposition based on the foregoing amendment.

Accordingly, Applicant respectfully requests that Application Serial No. 85/602,658 be amended as set forth hereinabove.

Dated: January 5, 2016

Respectfully submitted,

MORITT HOCK & HAMROFF LLP  
450 Seventh Avenue  
15<sup>th</sup> Floor  
New York, NY. 10123  
Tel. (212) 239-2000

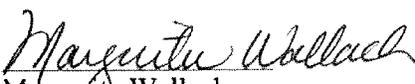
By:   
Michael F. Sarney

Brian A. Bloom  
MORITT HOCK & HAMROFF LLP  
400 Garden City Plaza  
Garden City, New York 11530  
Tel: (516) 873-2000

Attorneys for Applicant

Opposer, Speculative Product Design, LLC, d/b/a Speck Products, through its undersigned counsel of record, hereby consents to Applicant's foregoing amendment to Application Serial No. 85/602,658.

Dated: January 5, 2016

By:   
Marguerite Wallach  
Gary Fechter  
McCARTER & ENGLISH, LLP  
245 Park Avenue  
27<sup>th</sup> Floor  
New York, N.Y. 10167

Attorneys for Speculative Product Design,  
LLC d/b/a Speck Products

**CERTIFICATE OF SERVICE**

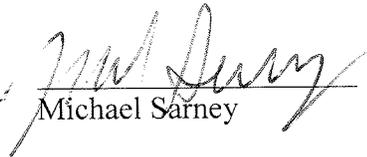
I, the undersigned, Michael Sarney, hereby certify that, on the 5 day of November, 2015, I caused to be served a true and correct copy of the foregoing

**MOTION ON CONSENT TO AMEND APPLICATION**

**by U.S. Mail, first-class**, by depositing the same in a depository of the United States Postal Service, on:

Margarita Wallach  
Gary Fechter  
McCARTER & ENGLISH, LLP  
245 Park Avenue  
27th Floor  
New York, N.Y. 10167

Attorneys for Opposer

  
Michael Sarney