

SHOBA P. REDDY

5237 ROCKY MOUNTAIN PL., ALTA LOMA, CA. 91737

TTAB

Shoba P. Reddy
Date: May 22nd, 2006

United States Patent and Trademark Office,
Trademark Trial and Appeal Board,
P0 Box 1451,
Alexandria, Va. 22313-1451

Cancellation No. 92045761

Reg. No. 2591666

Balck Wallet, LLC dba GoBaby

V.

REDDY, SHOBA P.



05-30-2006

U.S. Patent & TMO/TM Mail Rcpt Dt. #1

Dear Sirs,

Reply to Petition for Cancellation

I am in receipt of your letter dtd. 5/03/2006 regarding the above Petition for Cancellation filed by Black Wallet LLC dba GoBaby.

Below are my points in reply to the 5 points in their Petition for Cancellation. Their points are referred below in the same sequence used in their 'petition for cancellation' No. 92045761.

Point 1) We are in agreement that what is stated in their point 1 **is true**.

Point 2) Yes, they may have filed a registration application (serial # 78/463788) for the mark "GO BABY FOR BABIES ON THE MOVE" on Aug 6th, 2004.

Point 3) We are glad to note that the Trademark office's Examining Attorney has used his/her wise judgment and refused Petitioner's application as being confusingly similar to Registrant's Go! Baby. If the Petitioner is allowed to use the proposed mark "GO BABY FOR BABIES ON THE MOVE", the same will cause confusion in the minds of the consumer and **should not be allowed** as it will be a source of damage and injury to the registrant. Go! Baby is an existing brand fully active in the market place and the Registration should continue as heretofore.

Point 4) The petitioners allegation that Registrant has abandoned the Go! Baby mark is completely false. They have not done any research and are making wild claims. The Go! Baby mark has been used in commerce continuously since the beginning of 2001 and thus their statement that we are not using the mark is false.

We are enclosing the first invoice from Go Baby # 439483 dtd 01/23/2001, another # 456294 dtd 3/12/2003 and one of the latest #484191 dtd. 5/17/2006.. This clearly shows we have been doing business continuously from 2001. Go! Baby has done business to the tune of \$5.64 million since it's inception till May 19th, 2006.

Ph: 909 980 3407

Fx: 909 989 7082

e-mail: vinreddy@aol.com

We also enclose (See list of items below) copies of Ads placed at various times in various trade magazines plus articles about the Go! Baby line.

Thus, we request that the Petition for Cancellation be rejected and treated as frivolous.

Point 5) We request that petitioner's application 78/463788 be dismissed permanently and not just suspended.

Wherefore, Applicant requests that the Petition for Cancellation be set aside and no more such requests from the Petitioner be entertained.

Sincerely


Shoba P Reddy

Encl:

1. Invoice #439483 dtd 1/23/2001
2. Invoice # 456294 dtd 3/12/2003
3. Invoice # 484191 dtd 5/17/2006 (2 pages)
4. Advt taken in Dallas WTC Market Book – Aug. 2005
5. Americas Mart advt. taken out by our sales-reps Bob & Patti Vontour
6. Tack N togs (Trade magazine) – advt July 04
7. Tack N Togs – advt July 03
8. Tack n Togs – article and photo of product – dtd Jan 2003

In addition we are also listed in the World Trade Center, Dallas market books which occur 5 times a year. Same with Denver apparel markets as well as Atlanta, Reno, Indianapolis

CERTIFICATE OF MAILING - 1.

I hereby certify that this correspondence, and all papers referenced herein, is being deposited with THE UNITED STATES POSTAL SERVICE as First Class Mail in an envelope addressed to: Assistant Commissioner for Trademarks, P0 Box 1451, Alexandria, Va. 22313-1451, on this date May 25th, 2006

CERTIFICATE OF MAILING - 2.

I hereby certify that this correspondence, and all papers referenced herein, is being deposited with THE UNITED STATES POSTAL SERVICE as First Class Mail in an envelope addressed to: Stephen M. Evans, Graybeal, Jackson Haley LLP, 155, 108th Ave., NE STE. 350, Bellevue, WA 98004, USA, on this date May 25th, 2006

ONE STOP SHOP



Signature

GJ

Gordon & James



GORDON & JAMES - #14783

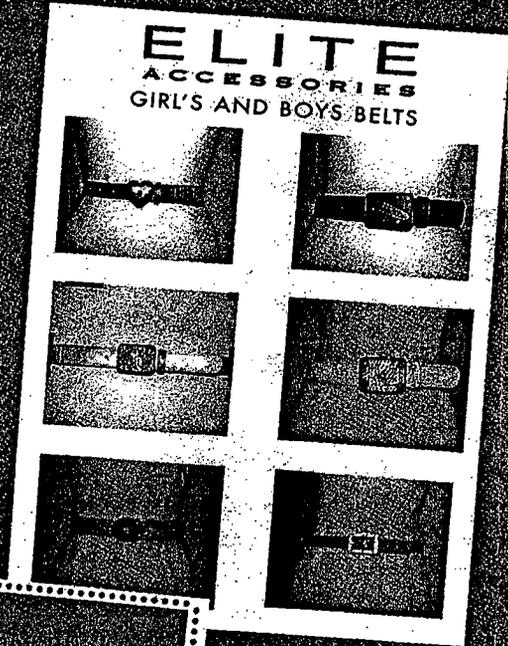
Ph: 800 861 9265 - 909 980 3407 (Intl)

Fax: 909 989 7082 email: info@gordonandjames.com

3

Bob & Patti Von Tour

(4)





mooncakes
new baby ≈ good fortune

Layette

786.552.1311
Coral Gables, Florida





blü



www.kricketsworld.com

Anniversary March 3, 1998
 phone 940-891-8828 • fax 940-891-8838 • vonbob@charter.net

CHILDREN'S APPAREL & ACCESSORIES

CHILD

Gordon + James - TNT - 7/64

BEST IN THE WEST



GORDON & JAMES



U.S.A



FASHION SOURCE

5237 ROCKY MTN PL.
ALTA LOMA, CA.91737

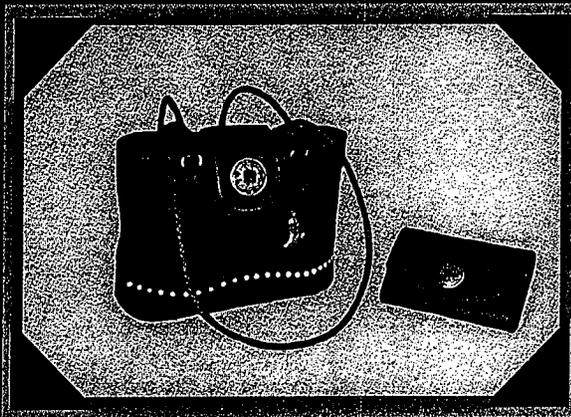
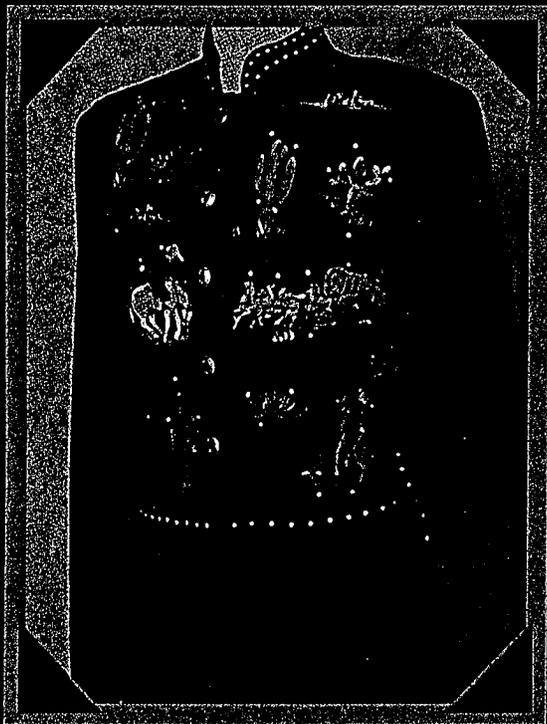
800 861 9265

Circle No. 182 on ACTIONCARD

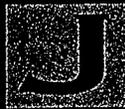
apparel

5

"Family Values"



GORDON & JAMES



SHIRT COMPANY



(Divisions of FASHION SOURCE)

5237 Rocky Mountain Pl., Alta Loma, Ca. 91737

Ph: 800 861 9265

Fax: 909 989 7082

info@GordonAndJames.com

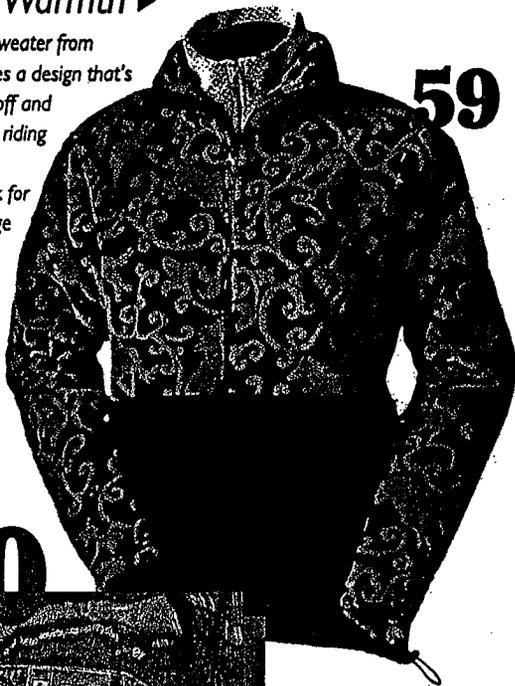
Circle No. 206 on ACTIONCARD

16

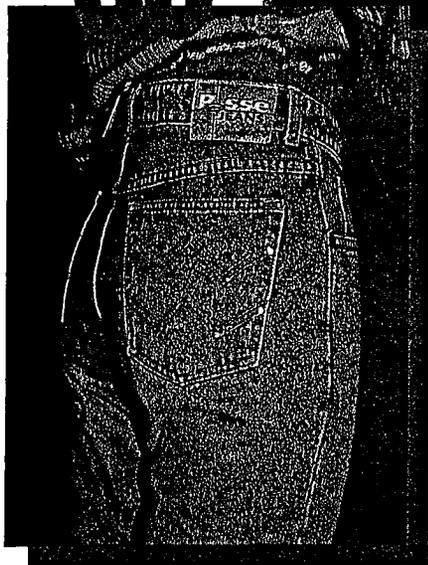
apparel

Ride in Warmth ▶

The mid-zip sweater from *Kerrits* features a design that's easy to take off and put on over a riding helmet, extra length in back for better coverage while riding, and is machine-washable. Circle No. 404 on ACTIONCARD



60



◀ Hot Pants

The Zora from *Capture Posse Jeans* by Lawman is a five-pocket Capri, 18-inch inseam, in comfort fit, and low-rise styling. Constructed from 14-ounce denim in antique wash with sandblast finish. Highlighted with silver rivets.

Circle No. 406 on ACTIONCARD

62



▲ Tot Togs

Gol Baby's Yee-Haw outfits for boys and girls come in 12-ounce washed, indigo denim combined with faux suede fringed chaps and borders. Faux suede appliqued mustangs and brass studs complete the design.

Circle No. 407 on ACTIONCARD

WE'RE  WORKING HARD TO MAKE YOUR LIFE EASY



GREAT PRODUCT

- *The Rambo Supreme* - Major commercial success in 2002.
- *The Horseware Corrib Jacket* - Voted BEST BUY in YOUR HORSE PRODUCT TEST, Winter 2002.

GREAT ADVERTISING

- Award winning advertising to promote our extensive product range.

GREAT SERVICE

- Our dedicated sales and marketing teams are here to help you and your customers.

RAMIBO® FOR YOU, YOUR HORSE, YOUR LIFESTYLE.

Tel: 1-800 TURNOUT Fax: (877) 329 4982
info@horseware.com www.horseware.com

GO! BABY
 A DIV. OF FASHION SOURCE
 5237 ROCKY MOUNTAIN PLACE
 ALTA LOMA CA 91737
 Tel: 800-861-9265 Fax: 909-989-7082

Invoice	Date
484191	05/17/2006

Bill To:
 DANCING WOLF LTD.,
 DBA EDWARD JAMES PROVENCE,
 534 TERRACE AVE.,
 CHAMA NM 87520

Ship to:
 DANCING WOLF LTD.,
 DBA EDWARD JAMES PROVENCE,
 534 TERRACE AVE.,
 CHAMA NM 87520

Acct	Purchase Order	Dept.	Terms	Rep1	Rep2	Ship Via	Order	Apprvl
DA051			NET 30	VON		UPS GROUND	158761	

Phone 405-650-1183 Vendor

Style	Description	Total Units	Price	Total Amt.
(1)	12 18 24			
GBB1070B	(SIG) Dnm Ovrlls/applq/shr Signature Cowboy	6	16.00	96.00
(1)	2 2 2			
(1)	12 18 24			
GBB1328B	(RLRDS) Strpd Shrtll/emb/tee Railroad Stripes	6	19.00	114.00
(1)	2 2 2			
(1)	12 18 24			
GBB1333B	(ROD) Shrtall/dnm Bib Rodeo	3	12.00	36.00
(1)	1 1 2			
(1)	12 18 24			
GBG1061B	(FOALS) L/s Tee/dnm Dress/em Foals	6	16.50	99.00
(1)	2 2 2			
(1)	12 18 24			
GBG1064B	(HOW) Dress/tee/wstrn Emb Howdy	6	18.90	113.40
(1)	2 2 2			
(1)	12 18 24			
GBG1327B	(RLRDS) Strpd Drss/emb/tee Railroad Stripes	6	19.00	114.00
(1)	2 2 2			

NOTE: 1) ANY PAYMENT IN ARREARS PAST DUE DATE SHOWN WILL BE CHARGED AT 2% PER MONTH ON THE UNPAID BALANCE.
 2) MAKE CHECKS PAYABLE TO FASHION SOURCE. PLS INCLUDE INVOICE #.

Due Date: 06/16/2006

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay This Amt.
882073	05/17/2006	1	29	05/15/2006	06/15/2006	484191	912.72

GO! BABY
 A DIV. OF FASHION SOURCE
 5237 ROCKY MOUNTAIN PLACE
 ALTA LOMA CA 91737
 Tel: 800-861-9265 Fax: 909-989-7082

Invoice	Date
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 CHAMA NM 87520

Acct	Purchase Order	Dept.	Terms	Rep1	Rep2	Ship Via	Order	Apprvl
DA051			NET 30	VON		UPS GROUND	158761	

Phone 405-650-1183 Vendor

Style	Description	Total Units	Price	Total Amt.
(1)	12 18 24			
GBG1332B	(ROD) Dress W/dnm Bib/pnty Rodeo	2	12.00	24.00
(1)	2			
(1)	12 18 24			
GBG1337B	(WILD) Bubble Shrtll/prntd Wild West	5	16.90	84.50
(1)	2 1 2			
(1)	12 18 24			
GBU1055B	(SIG) Dnm Jkt-emb/applique Signature Cowboy	6	11.50	69.00
(1)	2 2 2			
(1)	0-3 3-6 6-9			
GBU1056A	(SIG) Red Knit Onesie Signature Cowboy	6	12.50	75.00
(1)	1 3 2			
(1)	0-3 3-6 6-9			
GBU1073A	(HATNB) Bndna Onesie-applq Hat N Boots	6	12.50	75.00
(1)	1 3 2			
		Merchandise	58	899.90
		Freight		12.82

NOTE: 1) ANY PAYMENT IN ARREARS PAST DUE DATE SHOWN WILL BE CHARGED AT 2% PER MONTH ON THE UNPAID BALANCE.
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Due Date: 06/16/2006

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay This Amt.
882073	05/17/2006	1	29	05/15/2006	06/15/2006	484191	912.72

GO! BABY
 A DIV. OF FASHION SOURCE
 5237 ROCKY MOUNTAIN PLACE
 ALTA LOMA CA 91737
 Tel: 800-861-9265 Fax: 909-989-7082

Invoice	Date
439483	01/23/2001

Bill To:
 BOOT TOWN, INC
 P.O.BOX 59489,
 1130 DRAGON ST., STE 190,
 DALLAS TX 75207

Ship to: Store 6
 BOOT TOWN #6
 2901 ALTA MERE DR.
 FT. WORTH TX 76116

Acct	Purchase Order	Dept.	Terms	Rep1	Rep2	Ship Via	Order	Apprvl
BOOTT	16228		NET 30	MO		UPS GROUND	128662	

Phone (817)654-2668

Vendor

Style	Description				Total Units	Price	Total Amt.
(1)	S	M	L	XL			
B01260B	(DEN) Boys-cwby W/whip Emb Denim				6	14.40	86.40
(1)	2	2	2				
(1)	S	M	L	XL			
B02903B	(DEN) Girls-'I'll Cowgirl Denim				6	9.90	59.40
(1)	2	2	2				
(1)	S	M	L	XL			
B18260B	(DEN) Boys-basic W/logo Denim				6	12.40	74.40
(1)	2	2	2				
(1)	S	M	L	XL			
B25903B	(DEN) Boys-frnge/star/stds Denim				6	14.40	86.40
(1)	2	2	2				
					Merchandise	24	306.60
					Freight		8.03

NOTE: 1) ANY PAYMENT IN ARREARS PAST DUE DATE SHOWN WILL BE CHARGED AT 2% PER MONTH ON THE UNPAID BALANCE.
 2) MAKE CHECKS PAYABLE TO FASHION SOURCE. PLS INCLUDE INVOICE #.

Due Date: 02/22/2001

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay This Amt.
835628	01/23/2001	1	15	01/01/2001	02/15/2001	439483	314.63

GO! BABY
 A DIV. OF FASHION SOURCE
 5237 ROCKY MOUNTAIN PLACE
 ALTA LOMA CA 91737
 Tel: 800-861-9265 Fax: 909-989-7082

Invoice	Date
456294	03/12/2003

Bill To:
 BOOT BARN CORP.,
 1636 WEST COLLINS AVE.,
 ORANGE CA 92867-5421

Ship to:
 BOOT BARN CORP.,
 1636 WEST COLLINS AVE.,
 ORANGE CA 92867-5421

Acct	Purchase Order	Dept.	Terms	Rep1	Rep2	Ship Via	Order	Apprvl
BO550	BR112GOB		NET 30	BER		UPS Ground	140095	

Phone 714-288-8181

Vendor

Style	Description	Total Units	Price	Total Amt.
(1)	12 18 24			
G433B	(RPS) SLMs Drs/sued Frnge	30	9.90	297.00
(1)	10 10 10			
(1)	2T 3T 4T			
G433C	(RPS) SLMs Drs/sued Frnge	30	11.00	330.00
(1)	10 10 10			
FAX 714--288-8355		Merchandise	60	627.00

NOTE: 1) ANY PAYMENT IN ARREARS PAST DUE DATE SHOWN WILL BE CHARGED AT 2% PER MONTH ON THE UNPAID BALANCE.
 2) MAKE CHECKS PAYABLE TO FASHION SOURCE. PLS INCLUDE INVOICE #.

Due Date: 04/11/2003

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay This Amt.
853246	03/12/2003	2	30	02/01/2003	04/30/2003	456294	627.00