



TTAB

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

Oasis Intertrade Limited)
)
Petitioner,)
)
v.)
)
Lai Lai Department Store Co., Ltd.)
)
Registrant.)

Cancellation No.
Mark: **OK**
Registration No. 3,576,228

Attorney's Reference: 32320-334769

07/12/2012 SWILSON1 00000012 220261 3576228
01 FC:6401 300.00 DA

Commissioner for Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451

ATTN: BOX TTAB – FEE

PETITION TO CANCEL REGISTRATION NO. 3,576,228

Oasis Intertrade Limited (hereinafter "Petitioner"), a British Virgin Islands company having offices at Trident Chambers, Wickhams Cay, P.O. Box 146, Road Town, Tortola, British Virgin Islands, believes that it is and will be damaged by Registration No. 3,576,228 and hereby petitions to cancel the same.

As grounds for this Petition, it is alleged:

1. Petitioner has applied to register Application Serial Number 85/664007 for the trademark OK in the U.S., and it is anticipated that the U.S. Patent and Trademark Office will refuse registration of Petitioner's application based upon the allegation of a likelihood of confusion with the mark shown in Registration No. 3,576,228 (hereinafter "the Registered Mark"), thereby causing damage to Petitioner.



07-09-2012

2. After investigation and upon information and belief, Registrant is not currently using, the Registered Mark in the United States in connection with each of the services listed in the subject registration.
3. After investigation and upon information and belief, Registrant is not currently using, the Registered Mark in the United States in connection with any of the services listed in the subject registration.
4. After investigation and upon information and belief, Registrant has never used the Registered Mark in the United States in connection with each of the services listed in the subject registration
5. After investigation and upon information and belief, Registrant has never used the Registered Mark in the United States in connection with any of the services listed in the subject registration.
6. After investigation and upon information and belief, Registrant has no intention to begin use of the Registered Mark in the United States in connection with each of the services listed in the subject registration.
7. After investigation and upon information and belief, Registrant has no intention to begin use of the Registered Mark in the United States in connection with any of the services listed in the subject registration.
8. After investigation and upon information and belief, Registrant has abandoned use of the Registered Mark in the United States in connection with each of the services listed in the subject registration.

9. After investigation and upon information and belief, Registrant has abandoned use of the Registered Mark in the United States in connection with all of the services listed in the subject registration.

10. If the Registrant is permitted to retain Registration No. 3,576, 228, a cloud will be placed on Petitioner's Application, on the mark that is the subject of Petitioner's Application, and on Petitioner's right to use, register and expand the use of that mark. Continued registration of the Registered Mark would thus be a source of damage and injury to the Petitioner.

WHEREFORE, Petitioner respectfully requests that this Petition be granted and that Registration No. 3,576, 228 be cancelled.

Authorization is granted to charge the \$300.00 filing fee to Deposit Account No. 22-0261 and notify the undersigned accordingly.

Please conduct all correspondence in this matter with the undersigned at the below address.

Respectfully submitted,



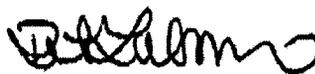
Date: 7/9/12

Rebecca Liebowitz
Mark B. Harrison
Michael Hall
Jeremy Klass
Venable LLP
P.O. Box 34385
Washington, D.C. 20048-9998
Telephone: 202-344-4000
Facsimile: 202-344-8300
Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition for Cancellation was served by U.S. Mail, first class, postage prepaid, on this 9 day of July, 2012, on the Registrant at the address listed in the current U.S. Trademark Office Records as follows:

Lai Lai Department Store Co., Ltd.
Songshan Distr. 1F., No. 87-3, Lane 155, Dun Hua N. Road
Taipei City 105
Taiwan



Rebecca Liebowitz