

ESTTA Tracking number: **ESTTA586749**

Filing date: **02/11/2014**

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

## Petition for Cancellation

Notice is hereby given that the following party requests to cancel indicated registration.

### Petitioner Information

Name	Steelcase Inc.		
Entity	Corporation	Citizenship	Michigan
Address	901 - 44th Street SE Grand Rapids, MI 49508-7575 UNITED STATES		

Attorney information	Tsan Abrahamson Cobalt LLP 918 Parker Street Building A21 Berkeley, CA 94710 UNITED STATES trademarks@cobaltlaw.com Phone:510-841-9800
----------------------	---

### Registration Subject to Cancellation

Registration No	1433907	Registration date	03/24/1987
Registrant	INSTA-GROUP US, INC. 3280 KURTZ STREET SAN DIEGO, CA 92110 CANADA		

### Goods/Services Subject to Cancellation

Class 019. First Use: 1984/08/13 First Use In Commerce: 1984/08/13 All goods and services in the class are cancelled, namely: MODULAR OFFICE SYSTEMS AND WORK SPACES COMPRISING INTERCONNECTING PANELS, PARTITIONS, DESKS AND WORK COUNTERS, SHELVES, CABINETS, DISPLAY CASES, LIGHT BOXES, AND ASSOCIATED LIGHTING AND ELECTRICAL CONDUITS
--

### Grounds for Cancellation

Abandonment	Trademark Act section 14
-------------	--------------------------

Attachments	EXPONENTS cancellation.pdf(1195741 bytes )
-------------	--

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Tsan Abrahamson/
-----------	-------------------

Name	Tsan Abrahamson
Date	02/11/2014

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

In the matter of Trademark Registration

Reg. No.: 1433907  
Registered: March 24, 1987  
By: Insta-Group US, Inc.  
For the Trademark: EXPONENTS

Steelcase Inc.,

Petitioner,

v.

Insta-Group US, Inc.,

Respondent.

Cancellation No.

**PETITION TO CANCEL**

Steelcase Inc. (“Steelcase” and “Petitioner”) believes that it will be damaged by the continued registration of the EXPONENTS mark for “modular office systems and work spaces comprising interconnecting panels, partitions, desks and work counters, shelves, cabinets, display cases, light boxes, and associated lighting and electrical conduits,” as listed in Registration No. 1433907 (“Registration”), and hereby petitions to cancel the same. As grounds for its cancellation, Steelcase alleges as follows:

**I. PARTIES**

1. Steelcase Inc. is a Michigan corporation, with its principal place of business at 901 – 44<sup>th</sup> Street SE, Grand Rapids, Michigan, 49508-7575, United States.

2. On information and belief, Registrant is a California corporation doing business at 3280 Kurtz Street, San Diego, California, 92110, United States (“Respondent”) and has never used the EXPONENTS mark in conjunction with the goods and services listed in its Registration. In the alternative, Registrant may have used the EXPONENTS mark in conjunction with the goods and services listed in its Registration (modular office systems and work spaces), but has since abandoned that use.

3. On information and belief, Registrant currently operates a website wherein the EXPONENTS mark is – and has always been – used in conjunction with trade show displays. The website is located at <http://www.exponents.com>. Indeed, the term is clearly coined from the words “EXhibit” “comPONENTS.”

4. On information and belief, and according to Registrant’s website, it has, “since its inception in 1980,” offered “product innovation and design excellence that has revolutionized the look of trade show floors in North America and beyond.” The company, based upon the information contained in its marketing materials, “has created a range of unique products customized to meet specific trade show needs[.]” Attached hereto as Exhibit A are true and correct copies of screenshots from Registrant’s website, showing its marketing material, company history, and products, none of which reference “modular office systems and work spaces.”

5. On information and belief, Registrant’s EXPONENTS mark was never used for modular office systems and work spaces. The products are clearly trade show displays not designed as modular office systems or work spaces (see Exhibit B).

## II. PETITIONER'S MARK, GOOD AND SERVICES

6. Petitioner seeks registration of EXPONENTS for office furniture.

## III. GROUNDS FOR CANCELLATION

### A. ABANDONMENT

Petitioner hereby incorporates by reference paragraphs 1 through 6 above as though fully set forth herein.

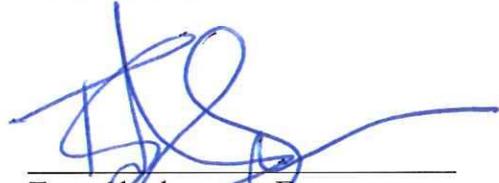
7. Upon information and belief Respondent has abandoned the EXPONENTS mark for modular office systems and work spaces and has no intent – if it ever had it – to reestablish such use. Petitioner is informed and believes that Respondent either never used the mark for office work spaces or ceased using the mark in connection with its goods years ago, and, furthermore, that Respondent has no intention of using the mark for office work spaces in the future.

8. Petitioner believes Respondent has never used, or has abandoned, the EXPONENTS mark in conjunction with the goods and services listed in the Registration without intent to reestablish such use. Petitioner believes it will be fully able to use its EXPONENTS trademark and to register same on the Principal Register only if Registration No. 1433907 is cancelled.

WHEREFORE, Petitioner believes that it is and will be damaged by said Registration and prays that Registration No. 1433907 be cancelled. The cancellation fee in the sum of \$300.00, pursuant to 37 C.F.R. §2.6(a)(16), has been electronically tendered from the Cobalt LLP deposit account, No. 503214.

Respectfully Submitted,

**COBALT LLP**



By:

\_\_\_\_\_  
Tsan Abrahamson, Esq.  
Amanda Conley, Esq.

Attorneys for Petitioner

Date: February 6, 2014

COBALT LLP  
918 PARKER STREET, BLDG A21  
BERKELEY, CALIFORNIA 94710  
TEL: 510.841.9800  
FAX: 510.295.2401  
E-MAIL: [TRADEMARKS@COBALTLAW.COM](mailto:TRADEMARKS@COBALTLAW.COM)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 14<sup>th</sup> day of February 2014, a true and correct copy of the foregoing Petition to Cancel was deposited in a U.S. Mailbox to be served upon Respondent by U.S. First Class Mail in an envelope, postage pre-paid, addressed as follows:

Insta-Group US, Inc.  
3280 Kurtz Street  
San Diego, CA 92110  
United States

Virginia P. Shogren  
Virginia P. Shogren, P.C.  
961 W. Oak Court  
Sequim, WA 98382

    NB Black    

NAME:     Norma Black

Exhibit A  
EXPONENTS Cancellation  
Reg. No. 1433907

Home > Our Story

## OUR STORY

### History of Exponents

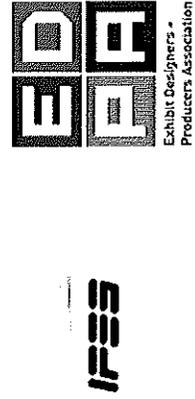
Since its inception in 1980, Exponents has carved out a unique identity of its own – an identity defined by constant product innovation and design excellence that has revolutionized the look of trade show floors in North America and beyond.

In our 30 years of experience, Exponents has created a range of unique products customized to meet specific trade show needs resulting in Exponents winning projects across the globe. Exponents pioneered the use of sophisticated, computerized machine tools and processes to create great 3-dimensional marketing tools. The company has produced several award winning custom exhibits, and received numerous other industry honors. Exponents is well-known for our attention to detail - before building your solution, our teams evaluate your product, market and goals to enable us to create outstanding custom exhibits designed specifically for you.

### Strong presence in North America

### Accolades

Members of



## RELATED LINKS

- [Our Story](#)
- [Exponents Today](#)
- [Our Purpose](#)

## CONTACT US

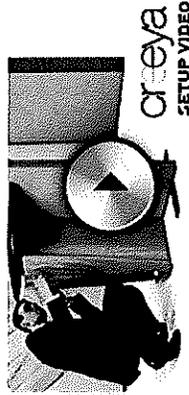
Exponents 1351, AIR WING  
 Road San Diego, CA. 92154  
 Toll-Free: 1.800.451.4723





- LINEARS
- ISLANDS
- RENTALS
- ACCESSORIES
- INTERNATIONAL EXHIBITING

Sturdy, appealing, tool-free kits. Light weight, easy to carry, fabric graphic back walls, high branding, flock of accessories.



**"We change the way the world Exhibits"**

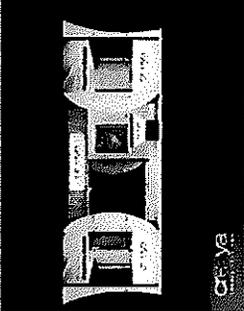
Exponents is an award winning global exhibit house based in San Diego, California that designs and manufactures custom modular and portable tradeshow display.

Since 1982, we helped businesses like yours maximize your ROI by creating innovative exhibit design, high quality display and graphics. We offer a complete range of display from linear exhibits to big island exhibits. Customers can also take advantage of Exponents special rental program, which helps them to keep a check on their tradeshow expense cost.

[Read More](#)



**Design Of The Week**



[Click Here](#)



**Request a Quote**



**Request Brochure**



**Shopping Guide**



**Knowledge Centre**

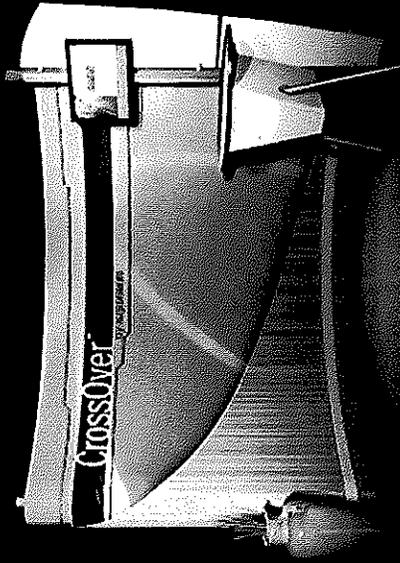
LINEARS

ISLANDS

RENTALS

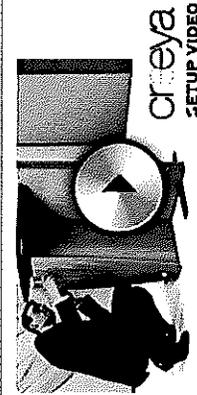
ACCESSORIES

INTERNATIONAL EXHIBITING



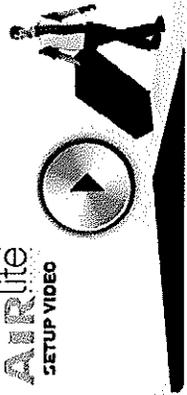
Crossover by Exponents

Support workstations, video and shelving  
Add counter tops and locking storage  
Incorporate curvatures with built-in lighting



creya  
SETUP VIDEO

AIRlite  
SETUP VIDEO



"We change the way the world Exhibits"

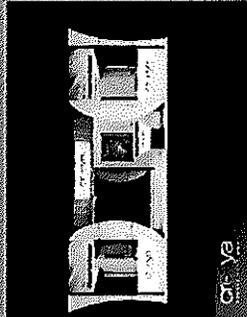
Exponents is an award winning global exhibit house based in San Diego, California that designs and manufactures custom modular and portable tradeshow display.

Since 1982, we helped businesses like yours maximize your ROI by creating innovative exhibit design, high quality display and graphics. We offer a complete range of display from linear exhibits to big island exhibits. Customers can also take advantage of Exponents special rental program, which helps them to keep a check on their tradeshow expense cost.

Read More



Design Of The Week



Click Here



Request a Quote



Request Brochure



Shopping Guide



Knowledge Centre

OUR STORY

- ▶ About Us
- ▶ Employment
- ▶ Our People
- ▶ Trade Shows
- ▶ Trade Shows

OUR SOLUTIONS

- ▶ Booth Design
- ▶ Booth Construction
- ▶ Booth Services
- ▶ Booth Rentals
- ▶ Booth Storage

OUR CAPABILITIES

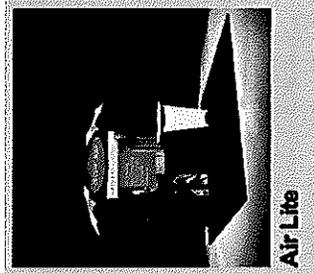
- ▶ Booth Production
- ▶ Booth Construction
- ▶ Project Safety
- ▶ Trade Show Design
- ▶ Booth Services

e-NEWSLETTER

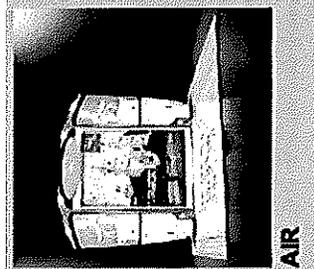
Click Here to Subscribe

Home > Our Solutions > Category Solution > Solutions by Products

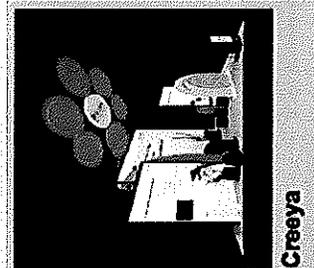
**SOLUTIONS BY PRODUCTS**



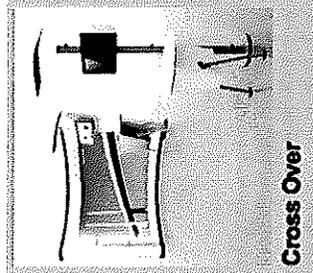
**Air Life**



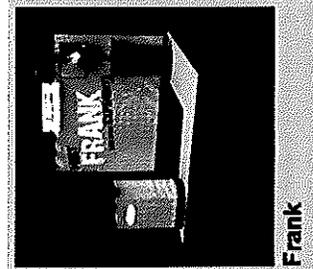
**AIR**



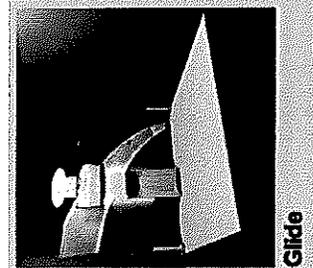
**Creeya**



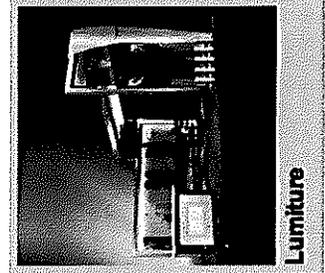
**Cross Over**



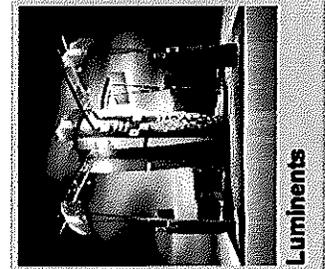
**Frank**



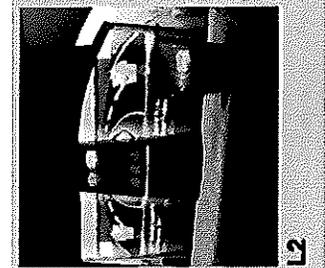
**Glide**



**Lumiture**



**Luminents**



**L2**

**SOLUTIONS**

- [Solutions By Products](#)
- [Solutions By Price](#)
- [Solutions By Size](#)
- [Rental Solutions](#)

**LATEST PRODUCTS**

Creeya



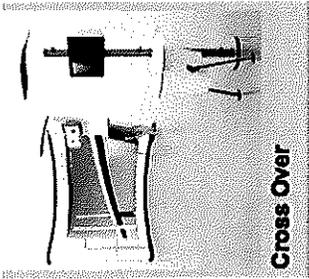
10'x20'



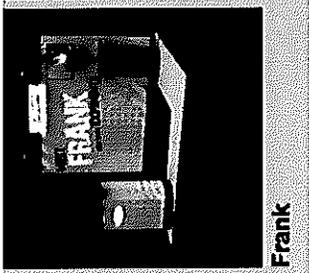
**CONTACT US**

Exponents 1351, AIR WING  
Road San Diego, CA. 92154  
Toll-Free: 1.800.451.4723

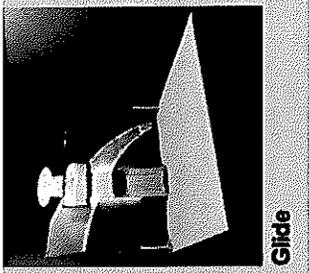




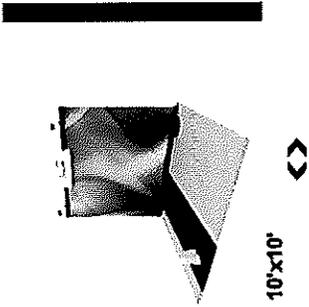
**Cross Over**



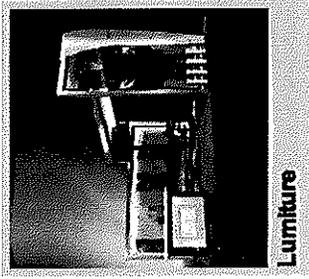
**Frank**



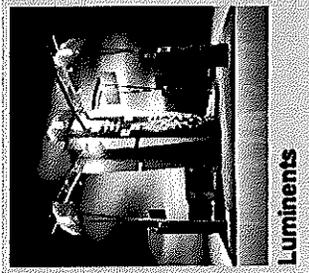
**Glide**



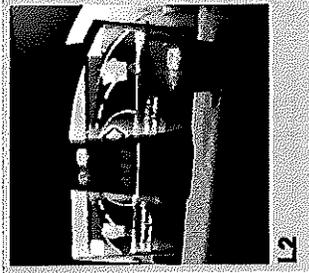
**10'x10'**



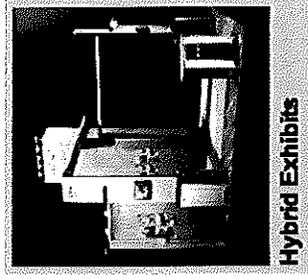
**Lumiture**



**Luminents**



**L2**



**Hybrid Exhibits**

**CONTACT US**

Exponents 1351, AIR WING  
 Road San Diego, CA. 92154  
 Toll-Free: 1.800.451.4723



**OUR STORY**

- ▶ Founding of Exponents
- ▶ Exponent's History
- ▶ Our Evolution
- ▶ Exponent's Growth
- ▶ Exponent's Future

**OUR SOLUTIONS**

- ▶ Booth Design & Construction
- ▶ Booth Rental
- ▶ Booth Maintenance & Repair
- ▶ Booth Relocation
- ▶ Booth Storage & Distribution

**OUR CAPABILITIES**

- ▶ Creative Booth Design
- ▶ Booth Construction
- ▶ Booth Relocation
- ▶ Booth Storage & Distribution
- ▶ Booth Maintenance & Repair

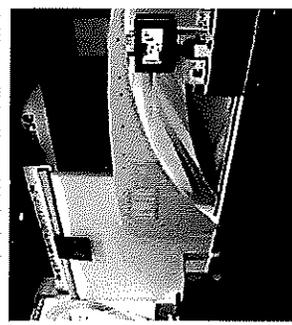
**e-NEWSLETTER**

[Click here to Subscribe](#)

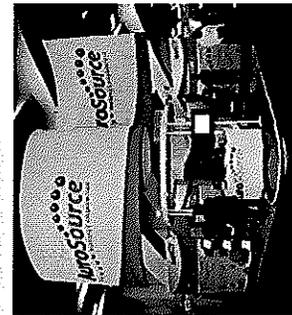
Exhibit B  
EXPONENTS Cancellation  
Reg. No. 1433907

Home > Project Gallery

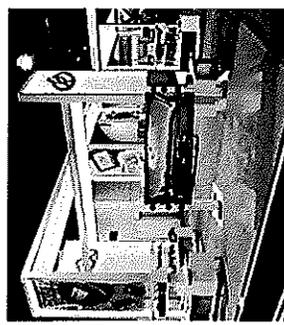
**PROJECT GALLERY**



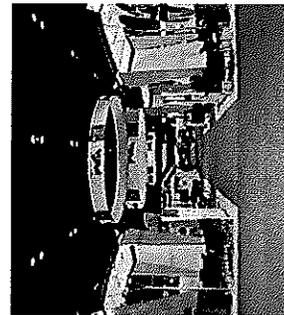
Linears



Small Islands



Large Islands



Pavilions

**OUR STORY**

- ▶ Mission & Vision
- ▶ Executive History
- ▶ Our People
- ▶ Trade Show Booth
- ▶ Trade Show Exhibitor

**OUR SOLUTIONS**

- ▶ Booth Design & Construction

**OUR CAPABILITIES**

- ▶ Booth Production

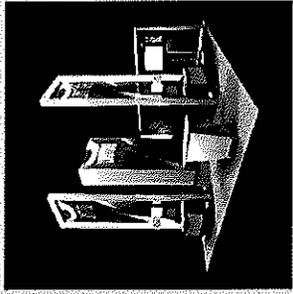
**e-NEWSLETTER**

[Click Here to Subscribe](#)

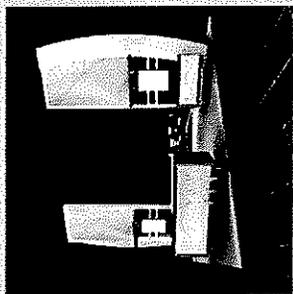
Home > Our Solutions > Solution by Category > Solutions by Rent

**RENTAL SOLUTIONS**

Our bouquet of Exhibit Rental offerings allow you to save huge cost. You may aim for hassle free services by opting Trade Show Rental solutions. Booth Rental is ideal for fast order processing and quick setup. Pick a design either by price or by size category below to shine notably & cost effectively, through trade show booth rentals.



By Size



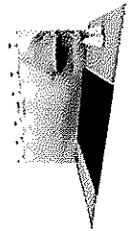
By Price

**SOLUTIONS**

- [Solutions By Products](#)
- [Purchase Solutions By Price](#)
- [Solutions By Size](#)
- [Rental Solutions](#)

**LATEST PRODUCTS**

Creeya



10'x20' <>

**CONTACT US**

Exponents 1351, AIR WING  
 Road San Diego, CA. 92154  
 Toll-Free: 1.800.451.4723

