

ESTTA Tracking number: **ESTTA628779**

Filing date: **09/23/2014**

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	Jahn & Associates		
Entity	limited liability corporation	Citizenship	NV
Address	1942 Broadway Suite 314 Boulder, CO 80304 UNITED STATES		

Correspondence information	Kirstin M. Jahn Jahn & Associates 1942 Broadway Suite 314 Boulder, CO 80304 UNITED STATES Kirstin@jahnlaw.com		
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**Registration Subject to Cancellation**

Registration No	4015965	Registration date	08/23/2011
Registrant	Melvin N.A. Avanzado 1880 Century Park East; Suite 1404 Los Angeles, CA 90067 UNITED STATES		

**Goods/Services Subject to Cancellation**

Class 045. First Use: 2008/03/01 First Use In Commerce: 2008/03/01 All goods and services in the class are cancelled, namely: Litigation services
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**Grounds for Cancellation**

Priority and likelihood of confusion	Trademark Act section 2(d)
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**Mark Cited by Petitioner as Basis for Cancellation**

U.S. Registration No.	3642830	Application Date	11/13/2008
Registration Date	06/23/2009	Foreign Priority Date	NONE
Word Mark	SMALL FIRM, BIG EXPERIENCE		

Design Mark	SMALL FIRM, BIG EXPERIENCE
Description of Mark	NONE
Goods/Services	Class 045. First use: First Use: 2001/10/31 First Use In Commerce: 2001/10/31 Legal services

Attachments	77613824#TMSN.png( bytes ) Cancellation of BIG FIRM EXPERIENCE.pdf(15510 bytes )
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### 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	s/KMJ/
Name	Kirstin M. Jahn
Date	09/23/2014

Cancellation of BIG FIRM EXPERIENCE ... SMALL FIRM SERVICE  
Registration No. 4015965

Statement of Claim

1. Jahn & Associates, LLC is the owner of a trademark registration for SMALL FIRM BIG EXPERIENCE which was registered on June 23, 2009 as United States Trademark Registration No. 3,642,830 for use in connection with legal services and has been in continuous use in commerce since October of 2001.
2. Since at least 2001, Jahn & Associates has expended a great amount of time, effort and money in connection with the promotion and advertisement of its services which are sold and offered for sale under the SMALL FIRM BIG EXPERIENCE mark and the Mark has become an asset of substantial value as a symbol of Jahn & Associates, its quality services and its goodwill.
3. Since at least 2001, Jahn & Associates has continuously, extensively and widely promoted, advertised and/or sold its services under the Mark in various states and foreign countries and has widely used the Mark to identify its services and distinguish them from the goods of others and continues to do so.
4. Notwithstanding Jahn & Associates' well-known and prior common law and statutory rights in the Mark, Respondent applied for, and received a federal registration for a confusingly similar mark, BIG FIRM EXPERIENCE... SMALL FIRM SERVICE for litigation services under Registration Number 4015965. Respondents use of its mark has and is likely to create confusion, mistake and deception as to the affiliation, connection, association, origin, sponsorship or approval of the services by Respondent with those of Jahn & Associates, all to Jahn & Associates' irreparable loss and damage.
5. Upon information and belief, actual confusion of consumers has occurred or will likely occur and will continue to occur as a result of the acts of Respondent, unless Respondent's mark is cancelled.

Respectfully submitted,  
s/Kirstin M. Jahn  
Jahn & Associates

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