

ESTTA Tracking number: **ESTTA669768**

Filing date: **04/30/2015**

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	Resignation Holdings, LLC		
Entity	limited liability company	Citizenship	DE
Address	98 San Jacinto Blvd. Suite 160 Austin, TX 78701 UNITED STATES		

Attorney information	Joseph Bonavita 98 San Jacinto Blvd. Suite 160 Austin, TX 78701 UNITED STATES joe.bonavita@thehive.com Phone:512-527-3557		
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Registration Subject to Cancellation

Registration No	3026083	Registration date	12/13/2005
Registrant	ENTRAVISION COMMUNICAITONS CORPORATION 2425 OLYMPIC BLVD., SUITE 6000W SANTA MONICA, CA 90404 UNITED STATES		

Goods/Services Subject to Cancellation

Class 038. First Use: 1997/11/01 First Use In Commerce: 1997/11/01 All goods and services in the class are cancelled, namely: Radio broadcasting services
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Grounds for Cancellation

Abandonment	Trademark Act section 14
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Attachments	Petition To Cancel Trademark.pdf(1005095 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 Overnight Courier on this date.

Signature	/Joseph Bonavita/
Name	Joseph Bonavita
Date	04/30/2015

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

In the matter of:
U.S. Trademark Registration No.: 3026083
For the mark "The Bomb"
Date registered: December 13, 2005

Resignation Holdings, LLC,)	
)	
Petitioner,)	
)	
v.)	Cancellation No.:
)	
Entravision Communications)	
Corporation,)	
)	
Respondent.)	

PETITION TO CANCEL

Petitioner, Resignation Holdings, LLC, ("Petitioner"), pursuant to 15 U.S.C. § 1064, petitions to cancel the U.S. Trademark Registration No. 3026083 for the word mark "THE BOMB" ("THE BOMB Trademark"). The grounds for cancellation are as follows:

1. Petitioner is a Delaware limited liability company, with its principal place of business at 98 San Jacinto Blvd., Austin, TX 78701.
2. Petitioner petitions to cancel the following U.S. Trademark Registration (the "Registration"):
 - a. Registration No.: 3026083
 - b. Word Mark: "THE BOMB"
 - c. Goods and Services: IC 38. Radio Broadcasting Services
 - d. Registration Date: December 13, 2005
3. According to the USPTO records, the current owner of the Registration for THE BOMB Trademark is Entravision Communications Corporation ("Registrant"), a Delaware

corporation, with its principal place of business at 2425 Olympic Blvd., Suite 6000W, Santa Monica, CA 90404.

4. According to the USPTO records, Registrant's Registration was issued on December 13, 2005.

Grounds for Cancellation: Abandonment

5. On information and belief, Registrant previously used THE BOMB Trademark solely in connection with the broadcast radio stations "103.5 FM" (call letters KBMB) (the "FM Station"); and "710 AM" (call letters KBMB) (the "AM Station").

Registrant's FM Station

6. Registrant currently exclusively uses the mark "Hot 103.5" (call letters KHHM) in connection with its FM Station services.

7. On information and belief, Registrant has exclusively used the "Hot 103.5" mark in connection with its FM Station services for, at least, the past three (3) consecutive years.

8. On information and belief, Registrant has not used THE BOMB Trademark in connection with its FM Station services for, at least, the past three (3) consecutive years.

9. Registrant has discontinued using THE BOMB Trademark in connection with its FM Station Services, with the intent not to resume use thereof.

Registrant's AM Station

10. Registrant currently exclusively uses the mark "710 AM ESPN Deportes" (call letters KBMB) in connection with Registrant's AM Station services.

11. On information and belief, Registrant has exclusively used the "710 ESPN Deportes" mark in connection with its AM Station Services for, at least, the past three (3) consecutive years.

12. On information and belief, Registrant has not used THE BOMB Trademark in connection with its AM Station services for, at least, the past three (3) consecutive years.

13. Registrant has discontinued using THE BOMB Trademark in connection with its AM Station Services, with the intent not to resume use thereof.

14. On information and belief, Registrant has not used THE BOMB Trademark in connection with the radio broadcasting services identified in its Registration for, at least, the past three (3) consecutive years.

15. Registrant has discontinued use of THE BOMB Trademark in connection with radio broadcasting services identified in its Registration, with the intent not to resume use thereof.

16. Registrant has abandoned THE BOMB Trademark, as provided by 15 U.S.C. § 1127.

17. On August 26, 2014, Petitioner filed its Section 1(b) Intent-to-use Application No. 86377630 (the "Application") with the USPTO, seeking U.S. registration of the trademark "The Bomb" in connection with, "Providing a website featuring non-downloadable videos in the field of humor, popular culture, and human interest."

18. On November 20, 2014, the USPTO Examining Attorney issued a Non-Final Office Action in connection with Application, citing a likelihood of confusion between Petitioner's applied-for "The Bomb" trademark and Registrant's THE BOMB Trademark.

19. Petitioner has been, and will be, damaged by Registrant's registration of THE BOMB Trademark.

WHEREFORE, Petitioner, Resignation Holdings, LLC, respectfully requests that the Trademark Trial and Appeal Board cancel U.S. Trademark Registration No. 3026083, together with any and all further relief in its favor as deemed just and equitable.

Dated: April 30, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joe Bonavita', written over a horizontal line.

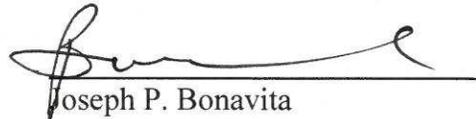
Joseph P. Bonavita
Resignation Holdings, LLC
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Austin, TX 78701
512-527-3557
joe.bonavita@thehive.com

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **PETITION TO CANCEL** has been served on Entravision Communications Corporation by depositing the same with an overnight courier on April 30, 2015, addressed to the following:

Entravision Communications Corporation
2425 Olympic Blvd., Suite 6000W
Santa Monica, CA 90404

A handwritten signature in black ink, appearing to read 'Joe Bonavita', written over a horizontal line.

Joseph P. Bonavita
Resignation Holdings, LLC
98 San Jacinto Blvd., Suite 160
Austin, TX 78701
512-527-3557
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Attorney for Petitioner