

ESTTA Tracking number: **ESTTA694549**

Filing date: **09/09/2015**

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	CRC Logistic Services, Inc.		
Entity	Corporation	Citizenship	Delaware
Address	32 Airline Drive Kenner, LA 70062 UNITED STATES		

Attorney information	Kate D. Strain Belzer PC 2905 Bull Street Savannah, GA 31405 UNITED STATES kstrain@belzerlaw.com Phone:912-236-3001		
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### Registration Subject to Cancellation

Registration No	4434327	Registration date	11/19/2013
International Registration No.	NONE	International Registration Date	NONE
Registrant	ROBERTO CAVALLI S.P.A. Piazza San Babila, 3  ITALY		

### Goods/Services Subject to Cancellation

Class 035. First Use: 0 First Use In Commerce: 0 All goods and services in the class are cancelled, namely: Advertising services; business management; business administration; office functions; dissemination of advertisements for others; dissemination of advertising matter; rental of advertising spaces; commercial or industrial business management consultancy and assistance; professional business consultancy; modeling for advertising or sales promotion; franchising, namely, services provided by a franchisor in helping, managing and developing commercial enterprises of retail fashion stores and fashion houses; gathering various goods allowing the consumer to view and buy the aforesaid goods in retail stores, namely, the bringing together, for the benefit of others, of a variety of goods in the field of clothing and accessories
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### Grounds for Cancellation

Abandonment	Trademark Act section 14
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Attachments	Petition to Cancel - On ground of non-use .pdf(76622 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	/Kate D. Strain/
Name	Kate D. Strain
Date	09/09/2015

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

_____	§	
CRC LOGISTIC SERVICES, INC.	§	
	§	Registration No.: 4,434,327
Petitioner	§	Issued: November 19, 2013
	§	
v.	§	
	§	
ROBERTO CAVALLI S.P.A.,	§	
	§	
Registrant	§	
_____	§	

**PETITION TO CANCEL**

Petitioner, CRC Logistic Services, Inc., a Delaware corporation with a business address of 32 Airline Drive, Kenner, Louisiana 70062, hereby petitions to cancel Class 35 of Registration No., 4,434,327 for the mark CRC (and Design), issued November 19, 2013, owned by Roberto Cavalli S.P.A.

As grounds for cancellation, Petitioner asserts as follows:

1. Petitioner's application for the mark CRC, Serial No. 86/686,346, sets forth the following relevant services:

*Class 35: Branding services, namely, consulting, development, management and marketing of brands for businesses and/or individuals; Business consulting services relating to product distribution, operations management services, logistics, reverse logistics, supply chain, and production systems and distribution solutions.*

2. Petitioner's application for the mark CRC, Serial No. 86/686,346, was initially refused registration by the United States Patent and Trademark Office in Class 35 on the grounds of likelihood of confusion with Registrant's U.S. Registration for the mark CRC (and Design).

3. On information and belief, Registrant has not used the CRC (and Design) mark in

the United States for the following services identified in Registrant's U.S. Registration 4,434,327:

*Class 35: Advertising services; business management; business administration; office functions; dissemination of advertisements for others; dissemination of advertising matter; rental of advertising spaces; commercial or industrial business management consultancy and assistance; professional business consultancy; modeling for advertising or sales promotion; franchising, namely, services provided by a franchisor in helping, managing and developing commercial enterprises of retail fashion stores and fashion houses; gathering various goods allowing the consumer to view and buy the aforesaid goods in retail stores, namely, the bringing together, for the benefit of others, of a variety of goods in the field of clothing and accessories.*

4. As a result of Registrant's non-use of the CRC (and Design) mark in connection with the services identified in Class 35 of U.S. Registration 4,434,327, Registrant has abandoned its CRC (and Design) mark shown in such registration for Class 35.

5. Continued registration of the mark shown in U.S. Registration 4,434,327 for Class 35 has and will continue to damage Petitioner.

6. Therefore, Class 35 of Registrant's U.S. Registration for the mark CRC (and Design) must be cancelled pursuant to 15 U.S.C. § 1064(3).

Wherefore, Petitioner prays that the Trademark Trial and Appeal Board grant this Petition for Cancellation and that Class 35 in Registration No. 4,434,327 for the mark CRC (and Design) be canceled.

Respectfully submitted,

Date: September 9, 2015

By: /Kate D. Strain/  
Belzer PC  
Attorney for Petitioner

Belzer PC  
2905 Bull Street  
Savannah, GA 31405  
(912) 236-3001 - Telephone  
(912) 236-3003 - Facsimile

**CERTIFICATE OF SERVICE**

I certify that this PETITION TO CANCEL was served on Registrant's Domestic Representative, by mailing a copy via overnight delivery to the correspondent listed in the Registration as follows:

Jeffrey B. Sladkus, Esq.  
The Sladkus Law Group  
Building 6, Suite 200  
1827 Powers Ferry Road  
Atlanta, GA 30339

Dated: September 9, 2015

/Kate D. Strain/

Kate D. Strain