

ESTTA Tracking number: **ESTTA703905**

Filing date: **10/22/2015**

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	Soccer Towns, LLC		
Entity	Corporation	Citizenship	Oklahoma
Address	4504 West Memphis St. Broken Arrow, OK 74012 UNITED STATES		

Attorney information	Connor Haskins Fears   Nachawati , PLLC 4925 Greenville Ave. Suite 715 Dallas, TX 75206 UNITED STATES ip@fnlawfirm.com, chaskins@fnlawfirm.com Phone:214-461-6223		
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### Registration Subject to Cancellation

Registration No	4269930	Registration date	01/01/2013
Registrant	Playlore LLC 69 Red Coat Road Westport, CT 06880 UNITED STATES		

### Goods/Services Subject to Cancellation

Class 041. First Use: 2012/05/30 First Use In Commerce: 2012/05/30  
All goods and services in the class are cancelled, namely: Entertainment services, namely, providing online computer and electronic games

### Grounds for Cancellation

Abandonment	Trademark Act section 14
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Attachments	Petition to Cancel - FINAL 2.pdf(378508 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	/Connor Haskins/
Name	Connor Haskins
Date	10/22/2015

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

*In re: Trademark Registration No. 4269930*

In re Registration No.: 4269930

For the Mark: SOCCER TOWN

Date of Registration: January 1, 2013

Soccer Towns, LLC Petitioner,  v.  Playlore LLC, Registrant.	Cancellation No.
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**PETITION TO CANCEL**

Petitioner, Soccer Towns, LLC, a limited liability company organized under the laws of Oklahoma, with a business address of 4504 W. Memphis St., Broken Arrow, Oklahoma 74012, believes that it is or will be damaged by Registration No. 4269930 and hereby petitions to cancel said registration.

As grounds of this Petition, it is alleged that:

1. On April 28, 2015, Petitioner filed App. Ser. No. 86612241 to register the word mark SOCCERTOWNS for “Downloadable e-books in the field of Children Books; Mouse pads” (the “Word Mark”). Title and status copies of Petitioner’s application are attached as **Exhibit A**.
2. Petitioner was issued an initial office action for the Word Mark, dated August 14, 2015 based on a likelihood of confusion with the mark SOCCER TOWN (Registration No. 4269930).
3. Registrant’s application to register the mark in Registration No. 4269930 was filed with an intent to use basis on October 14, 2011 and was assigned App. Ser. No. 85447982.
4. The goods and services identified in Registration No. 4269930 are “Entertainment services, namely, providing online computer and electronic games.”

5. Registrant claims the first use anywhere and the first use in commerce of their mark, SOCCER TOWN was at least as early as May 30, 2012.
6. Since the issuance of the Initial Office Action, Petitioner has done extensive research and found no actual use of the SOCCER TOWN mark in connection with the currently listed products.
7. Further, Registrant has shown no interest in pursuing others that are using confusingly similar marks, or in continuing business under the SOCCER TOWN mark.
8. Based upon information of Registrant's non-use of the mark in Registration No. 4269930, Registrant's mark SOCCER TOWN has been abandoned within the meaning of Section 14(3) of the Lanham Act.
9. Petitioner alleges that Petitioner's continued and legal use of Petitioner's SOCCERTOWNS word mark will be impaired by the continued registration of said SOCCER TOWN service mark(s) of Registrant.

WHEREFORE, Petitioner prays that Registration No. 4269930 be cancelled and that this Petition for Cancellation be sustained in favor of Petitioner.

Dated: October 22, 2015.

Respectfully submitted,

FEARS | NACHAWATI, PLLC

/Connor Haskins/

Connor Haskins

Texas Bar No. 24087680

[chaskins@fnlawfirm.com](mailto:chaskins@fnlawfirm.com)

Adam R. Villanueva

Texas Bar No.: 24084023

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4925 Greenville Avenue #715

Dallas, Texas 75206

T. (214) 890.0711

F. (214) 890.0712

**CERTIFICATE OF SERVICE**

I certify a true and correct copy of the foregoing document has been sent via U.S. mail to Registrant at the following address:

Chester Rothstein  
Amster, Rothstein, & Ebenstein LLP  
90 Park Ave.  
New York, New York 10016-1301

*/Connor Haskins/*  
Connor Haskins

Dated: October 22, 2015

# **EXHIBIT A**

# Trademark/Service Mark Application, Principal Register

## TEAS Plus Application

Serial Number: 86612241

Filing Date: 04/28/2015

*NOTE: Data fields with the \* are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
<b>TEAS Plus</b>	<b>YES</b>
<b>MARK INFORMATION</b>	
*MARK	<a href="#">SoccerTowns</a>
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SoccerTowns
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
<b>REGISTER</b>	Principal
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	Soccertowns LLC
*STREET	4504 W. Memphis St
*CITY	Broken Arrow
*STATE (Required for U.S. applicants)	Oklahoma
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	74012
PHONE	918-8933121
EMAIL ADDRESS	andresvarela@hotmail.com

<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>LEGAL ENTITY INFORMATION</b>	
<b>*TYPE</b>	LIMITED LIABILITY COMPANY
<b>* STATE/COUNTRY WHERE LEGALLY ORGANIZED</b>	Oklahoma
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
<b>*INTERNATIONAL CLASS</b>	009
<b>*IDENTIFICATION</b>	Downloadable e-books in the field of <b>Children Books</b> ; Mouse pads
<b>*FILING BASIS</b>	SECTION 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 05/13/2013
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 09/01/2014
<b>SPECIMEN FILE NAME(S)</b>	<a href="\\TICRS\EXPORT16\IMAGEOUT16\866\122\86612241\xml1\FTK0003.JPG">\\TICRS\EXPORT16\IMAGEOUT16\866\122\86612241\xml1\FTK0003.JPG</a>
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<b>SPECIMEN DESCRIPTION</b>	digital images of a website currently used in commerce
<b>*INTERNATIONAL CLASS</b>	016
<b>*IDENTIFICATION</b>	Children's books; Pens
<b>*FILING BASIS</b>	SECTION 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 05/13/2013
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 09/01/2014
<b>SPECIMEN FILE NAME(S)</b>	<a href="\\TICRS\EXPORT16\IMAGEOUT16\866\122\86612241\xml1\FTK0006.JPG">\\TICRS\EXPORT16\IMAGEOUT16\866\122\86612241\xml1\FTK0006.JPG</a>
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<b>SPECIMEN DESCRIPTION</b>	digital images of a website currently used in commerce
<b>ADDITIONAL STATEMENTS INFORMATION</b>	

<b>*TRANSLATION</b> (if applicable)	
<b>*TRANSLITERATION</b> (if applicable)	
<b>*CLAIMED PRIOR REGISTRATION</b> (if applicable)	
<b>*CONSENT (NAME/LIKENESS)</b> (if applicable)	
<b>*CONCURRENT USE CLAIM</b> (if applicable)	
<b>CORRESPONDENCE INFORMATION</b>	
<b>*NAME</b>	Soccertowns LLC
<b>*STREET</b>	4504 W. Memphis St
<b>*CITY</b>	Broken Arrow
<b>*STATE</b> (Required for U.S. applicants)	Oklahoma
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE</b>	74012
<b>PHONE</b>	918-8933121
<b>*EMAIL ADDRESS</b>	andresvarela@hotmail.com
<b>*AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>FEE INFORMATION</b>	
<b>APPLICATION FILING OPTION</b>	TEAS Plus
<b>NUMBER OF CLASSES</b>	2
<b>FEE PER CLASS</b>	225
<b>*TOTAL FEE PAID</b>	450
<b>SIGNATURE INFORMATION</b>	
<b>* SIGNATURE</b>	/andres varela/
<b>* SIGNATORY'S NAME</b>	Andres Varela
<b>* SIGNATORY'S POSITION</b>	President
<b>SIGNATORY'S PHONE NUMBER</b>	918-8933121
<b>* DATE SIGNED</b>	04/27/2015





## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

**Serial Number: 86612241**

**Filing Date: 04/28/2015**

#### **To the Commissioner for Trademarks:**

**MARK:** SoccerTowns (Standard Characters, see [mark](#))

The literal element of the mark consists of SoccerTowns.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Soccertowns LLC, a limited liability company legally organized under the laws of Oklahoma, having an address of

4504 W. Memphis St  
Broken Arrow, Oklahoma 74012  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

#### **For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 009: Downloadable e-books in the field of Children Books; Mouse pads

In International Class 009, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 05/13/2013, and first used in commerce at least as early as 09/01/2014, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) digital images of a website currently used in commerce.

[Specimen File1](#)

[Specimen File2](#)

[Specimen File3](#)

#### **For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 016: Children's books; Pens

In International Class 016, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 05/13/2013, and first used in commerce at least as early

as 09/01/2014, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) digital images of a website currently used in commerce.

[Specimen File1](#)

[Specimen File2](#)

[Specimen File3](#)

The applicant's current Correspondence Information:

Soccertowns LLC

4504 W. Memphis St

Broken Arrow, Oklahoma 74012

918-8933121(phone)

andresvarela@hotmail.com (authorized)

**E-mail Authorization:** I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$450 has been submitted with the application, representing payment for 2 class(es).

### **Declaration**

The signatory believes that: if the applicant is filing the application under 15 U.S.C. Section 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant or the applicant's related company or licensee is using the mark in commerce on or in connection with the goods/services in the application, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Signature: /andres varela/ Date Signed: 04/27/2015

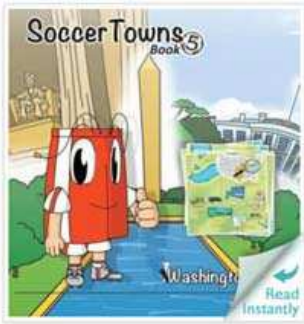
Signatory's Name: Andres Varela

Signatory's Position: President

RAM Sale Number: 86612241  
RAM Accounting Date: 04/28/2015

Serial Number: 86612241  
Internet Transmission Date: Tue Apr 28 13:24:03 EDT 2015  
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DA-14503-20150427162621049437

# Soccer Towns



## Soccertowns Book 5

by Andres Varela, Germ n Hernandez (Produced by), Carlos F Gonzalez (Illustrator)

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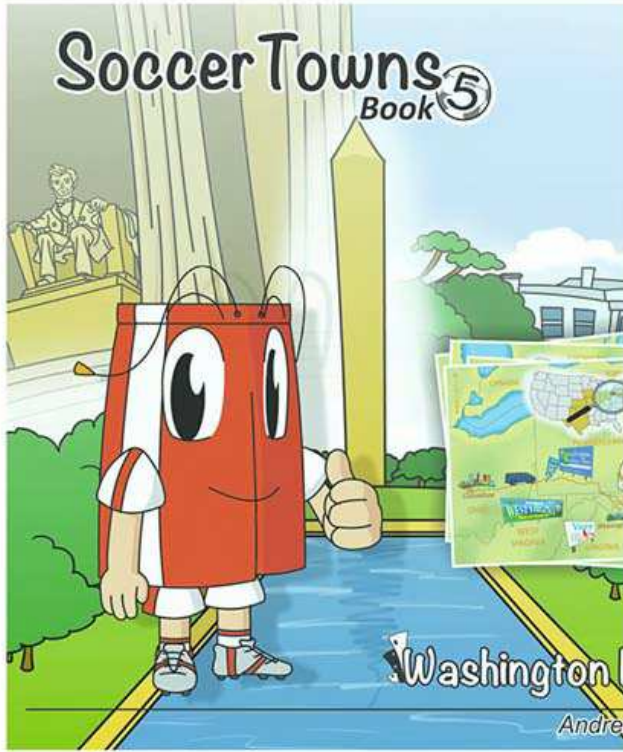
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# SoccerTowns

## Book Five

Andres Varela

Illustrations and Graphic Design by Carlos F. González

Co-Producer Germán Hernández

[www.soccertowns.com](http://www.soccertowns.com)

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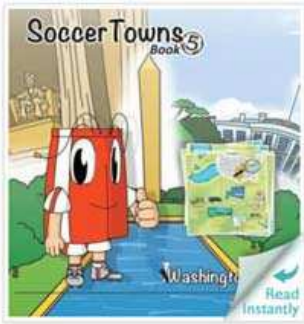
  


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## Soccertowns Book 5

by Andres Varela, Germ n Hernandez (Produced by), Carlos F Gonzalez (Illustrator)

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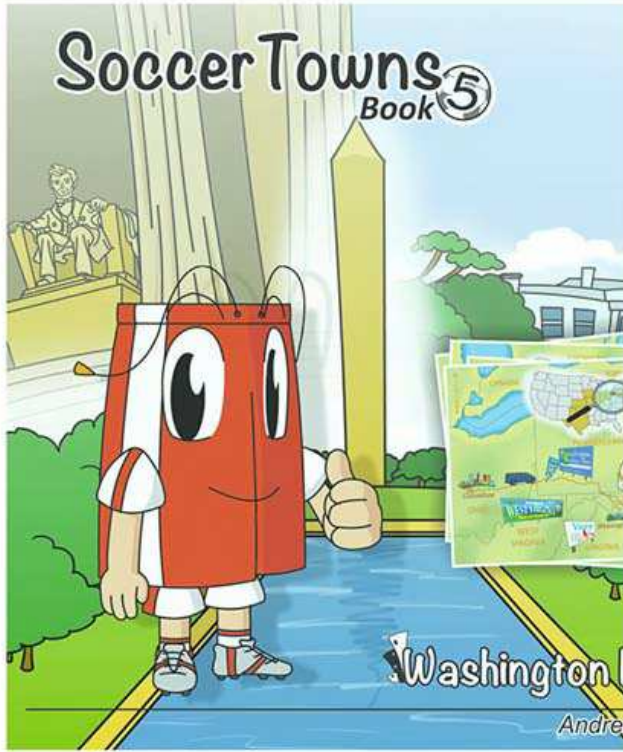
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## Book Five

Andres Varela

Illustrations and Graphic Design by Carlos F. González

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