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

Proceeding	91161183
Party	Defendant Orange Brand Services Limited
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Attachments	ORANGE WORLD 91-163,494- Motion to Amend With Consent.PDF (5 pages) (225492 bytes)

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

In the Matter of Application No. 75/877,398 for the mark
ORANGE WORLD in International Classes 35, 36, 37, 38, 41, and 42,
Published for opposition in the Official Gazette of August 24, 2004

ING DIRECT BANCORP (by change of name from ING USA HOLDING CORPORATION),)	
)	CONSOLIDATED
Opposer,)	Opposition Nos. 91161183 (Parent)
)	91162981
v.)	91163494
)	91163523
ORANGE BRAND SERVICES LIMITED, ¹)	91164137
)	91164807
Applicant.)	91185077
)	
)	
)	

MOTION TO AMEND APPLICATION WITH CONSENT

Applicant, Orange Brand Services, Ltd. ("OBSL"), by and through its undersigned counsel, Crowell & Moring, LLP, hereby moves on behalf of and with the consent of Opposer, ING Direct Bancorp ("ING") to amend the application for the mark ORANGE WORLD as follows, pursuant to 37 CFR § 2.133 and TBMP §§ 514 and 514.02, subject to the approval of the United States Patent and Trademark Office and the Trademark Trial and Appeal Board:

1. Trademark Application Serial No. 75/877,398 for the mark ORANGE WORLD is the subject of Opposition Proceeding No. 91/163,494 which

¹ A Trademark Assignment effective between Orange Personal Communication Services Limited and Orange Brand Services Limited was filed and recorded with the United States Patent and Trademark Office on April 18, 2011. See, Reel/Frame 4523/0589.

was later consolidated with Opposition Proceeding Nos. 91/161,183, 91/162,981, 91/163,523, 91/164,137 and 91/164,807 into Consolidated Opposition Proceeding No. 91/161,183 on March 7, 2007.

2. Trademark Application Serial No. 75/877,398 for the mark ORANGE WORLD is also the subject of Opposition Proceeding No. 91/185,077 which was later consolidated with Opposition Proceeding Nos. 91/161,183, 91/162,981, 91/163,494, 91/163,523, 91/164,137, and 91/164,807 into Consolidated Opposition Proceeding No. 91/161,183 on August 13, 2008.

3. Trademark Application Serial No. 75/877,398 for the mark ORANGE WORLD is also the subject of Opposition Proceeding No. 91/189,140, which has been maintained as its own separate Opposition Proceeding, which was filed by OBSL against ING Direct Bancorp on July 8, 2008.

4. Ms. Erin Hickey, counsel for the Applicant, ING Direct Bancorp, in Opposition Proceeding Nos. 91/185,077, now consolidated into Consolidated Opposition Proceeding No. 91/161,183, and 91/189,140 also has consented to Applicant's Motion to Amend Trademark Application Serial No. 75/877,398 for the mark ORANGE WORLD by telephone on April 25, 2011.

5. Applicant hereby amends Application Serial No. 75/877,398 to register the mark ORANGE WORLD, by deleting "Insurance, namely, insurance administration, insurance agencies, insurance brokerage, insurance claims processing, insurance consultation, insurance actuarial services, insurance

subrogation and salvage and; credit card and transaction services; financial information services, namely providing stock exchange quotations and stocks and shares information; stocks and bonds brokerage; information and consulting services relating to insurance, financial affairs, monetary affairs, home and on-line banking, real estate affairs, stocks and share information, stocks and bonds brokerage, provided on-line from a computer database or the Internet; providing an on-line computer database in the field of financial, real estate, stocks and shares” from the identification of services in International Class 36.

6. Applicant hereby further amends Application Serial No. 75/877,398 to register the mark ORANGE WORLD, by adding the following language to the end of the identification of services in International Class 36: “providing extended warranties and insurance for telecommunications and computing equipment and devices, telecommunications and computing networks and systems, broadband and other Internet access services”.

7. It is respectfully submitted, the above amendments should be permitted because they limit and clarify the services originally listed in the application.

8. As amended, the services included in International Class 36 in Application Serial No. 75/877,398 now read:

Financing of telecommunications apparatus, systems and installations; charitable fund raising services, namely organizing charitable collections and fund raising activities; financial sponsorship in the areas of sports,

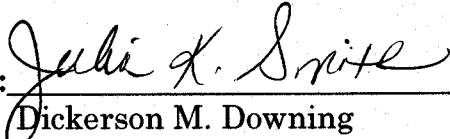
cultural activities and the arts; providing extended warranties and insurance for telecommunications and computing equipment and devices, telecommunications and computing networks and systems, broadband and other Internet access services.

If the United States Patent and Trademark Office or Trademark Trial and Appeal Board do not approve any part of this Motion, then the amendments by Applicant in Paragraphs 5 and 6 shall be deemed to be revoked.

Respectfully submitted,

CROWELL & MORING, LLP

Dated: New York, New York
May 10, 2011

By: 

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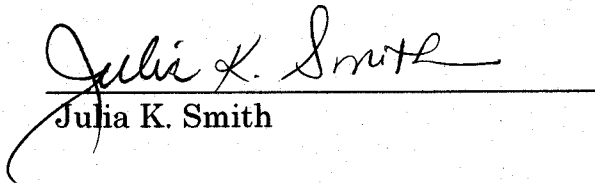
SO ORDERED:

Trademark Trial and Appeal Board

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May 2011, a true and correct copy of the foregoing document was served on counsel for the Opposer, ING Direct Bancorp, by first class mail and electronic mail to:

Catherine H. Stockell, Esq.
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Julia K. Smith