

ESTTA Tracking number: **ESTTA565190**

Filing date: **10/16/2013**

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

Proceeding	91212911
Party	Defendant Momon, Jamal, H
Correspondence Address	MOMON, JAMAL, H MOMON, JAMAL, H 141 GREEN ST ENGLEWOOD, NJ 07631-3244 jamal.momon@gmail.com
Submission	Answer
Filer's Name	Jamal Momon
Filer's e-mail	jamal.momon@gmail.com
Signature	/Jamal Momon/
Date	10/16/2013
Attachments	Rockford_Opposition Answer.pdf(659162 bytes)



Jamal Momon
CEO
Dirty Razkal, LLC
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201-304-3148

DIRTY RAZKAL

Emily A. Bayton
Lewis Roca Rothgerber LLP
40 North Central Avenue
Suite 1900
Phoenix, Arizona 85004-4429

Dear Emily Bayton;

I, Jamal Momon, am presenting you with this answer to your opposition. I have read and understood the opposition in its entirety, and have a few points to clarify.

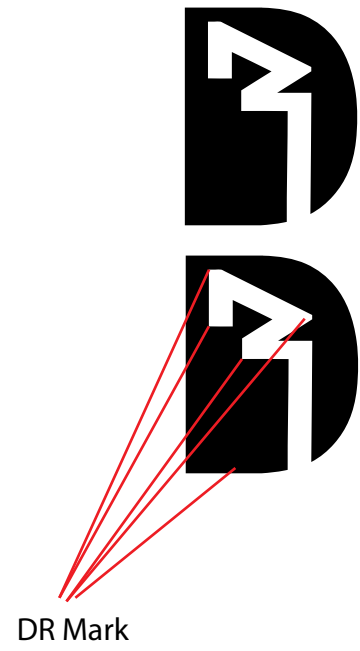
1. The Dirty Razkal brand does not, in any way, shape, or form, wish to be affiliated with the Rockford brand. The DR mark was not created to resemble the Rockford mark, nor are there any benefits in doing so. Rockford is not a clothing company and the Dirty Razkal consumer would not purchase clothing that seemed to be affiliated with a sound and electronics company. If anything, this "connection" would hinder Dirty Razkal sales and dilute the brand name, which is last thing we want.

2. The U.S. Fed Reg No. 2630917 is the only Rockford R Mark trademark that references clothing and states that the mark consists of a stylized R within a diamond shape. Our R shape is not the same as the Rockford R, which you will see in Exhibit A, and we are not placing the R within a diamond shape. As you know, trademark descriptions are extremely specific and the Mark description for U.S. Fed Reg No. 2630917 proves the distinction between the two with the usage of the diamond shape.

3. Once we received the Notice of Extension from the trademark commission, we opted to start the transition to our "King Me" crown logo, which as you stated, is our prominent logo. We chose to move forward with the King Me mark to avoid any future oppositions or frustrations we may encounter with the Rockford brand. We will no longer be using the DR mark as our logo, but we have current products where the mark is displayed. Once these products are sold, the DR mark will cease to be used. We do not plan to stop the filing of this trademark as we have already paid for the filing of it and believe our mark and description to be considerably different than the Rockford Mark. Our mark is a stylized R with square edges meshed within a D shape. The Rockford mark is a stylized R with sharp edges within a diamond shape (as per the trademark description). All other Rockford marks do not pertain to clothing and are therefore irrelevant. Hopefully we can come to an agreement without having to take matters further.

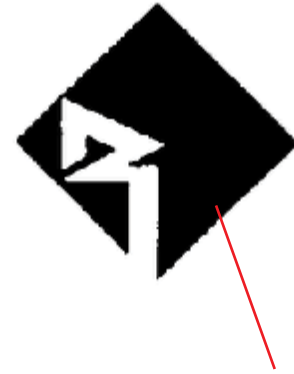
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Exhibit A



DR Mark

1. Square edges
2. Stylized R is within a D shape



Rockford Mark

1. Sharp edges
2. Stylized R is within a Diamond Shape

Exhibit B

Specifically states the use of the diamond shape.



R

By: **ROCKFORD CORPORATION**

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Clothing, namely t-shirts, golf shirts, knit shirts, nightshirts, polo shirts, sweatshirts, undershirts, jackets, leather jackets, wind-resistant jackets, hats, baseball caps, and jerseys

Perfect for these industries

- [Clothing Products](#)

Words that describe this logo

[clothing](#) [tshirts](#) [golf shirts](#) [knit shirts](#) [nightshirts](#) [polo shirts](#) [sweatshirts](#) [undershirts](#) [jackets](#) [leather jackets](#) [windresistant](#) [jackets](#)

This is a brand page for the **R** trademark by **ROCKFORD CORPORATION** in **Tempe, AZ, 85281**. [Write a review](#) about a product or service associated with this **R** trademark. Or, contact the owner **ROCKFORD CORPORATION** of the **R** trademark by filing a request to communicate with [the Legal Correspondent](#) for licensing, use, and/or questions related to the **R** trademark.

On **Wednesday, May 23, 2001**, a U.S. federal trademark registration was filed for **R** by **ROCKFORD CORPORATION**, Tempe, AZ 85281. The USPTO has given the **R** trademark serial number of **76261820**. The current federal status of this trademark filing is **REGISTERED AND RENEWED**. The correspondent listed for **R** is **Emily A. Bayton** of **LEWIS AND ROCA LLP, 40 NORTH CENTRAL AVENUE, SUITE 1900, PHOENIX AZ 85004-4429**. The **R** trademark is filed in the category of [Clothing Products](#). The description provided to the USPTO for **R** is Clothing, namely t-shirts, golf shirts, knit shirts, nightshirts, polo shirts, sweatshirts, undershirts, jackets, leather jackets, wind-resistant jackets, hats, baseball caps, and jerseys.

Word Mark:	R
Status/ Status Date:	REGISTERED AND RENEWED 2/23/2012
Serial Number:	76261820
Filing Date:	5/23/2001
Registration Number:	2630917
Registration Date:	10/8/2002
Goods and Services:	Clothing, namely t-shirts, golf shirts, knit shirts, nightshirts, polo shirts, sweatshirts, undershirts, jackets, leather jackets, wind-resistant jackets, hats, baseball caps, and jerseys
Mark Description:	NOT AVAILABLE
Type Of Mark:	TradeMark
Published For Opposition Date:	7/16/2002
Last Applicant/Owner:	ROCKFORD CORPORATION Tempe, AZ 85281 Why is this contact information displayed?
Mark Drawing Code:	Drawing/Design + Words
Design Search:	Diamonds that are completely or partially shaded (Geometric figures and solids - Diamonds)