

ESTTA Tracking number: **ESTTA680394**

Filing date: **06/26/2015**

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

Proceeding	91220234
Party	Defendant RGF Environmental Group, Inc.
Correspondence Address	MARTIN M ZOLTICK ROTHWELL, FIGG, ERNST & MANBECK, PC 607 14TH ST NW , STE 800 WASHINGTON, DC 20005-2005 UNITED STATES PTO-TM-Email@rfem.com
Submission	Motion to Amend Application
Filer's Name	Leo M. Loughlin
Filer's e-mail	PTO-TM-Email@rothwellfigg.com
Signature	/Leo M. Loughlin/
Date	06/26/2015
Attachments	Motion to Amend Application.pdf(54260 bytes )

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

Halo Innovations, Inc.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91220234
	)	
	)	Mark: REME HALO
	)	
RGF Environmental Group, Inc.	)	
	)	
Applicant	)	Serial No.: 86-261702

---

**Motion to Amend Application Pursuant to TBMP § 605.03(b)**

Pursuant to TBMP § 605.03(b), RGF Environmental Group, Inc. (“Applicant”) hereby requests the Board to enter an amendment revising the identification of goods listed in Applicant’s application to register REME HALO (the “Subject Application”).

Applicant and Opposer, Halo Innovations Inc., have reached an agreement (“the Agreement”) that resolves the dispute in this proceeding. Pursuant to the terms of the Agreement, Applicant requests amendment to the identification of the goods listed in the Subject Application to read as follows:

**“Air purification units which utilize an oxidation plasma consisting of ionized hydro-peroxides, super oxide ions and hydroxide ions, excluding air filters” in Class 11**

Applicant requests that the Board enter the above amendment revising the identification of goods in the Subject Application. This amendment does not broaden, but rather limits, the identification of goods.

A Withdrawal of the Opposition will be separately filed by the Parties upon approval of the Amendment.

Respectively Submitted,  
RGF Environmental Group, Inc.



Martin M. Zoltick  
Leo M. Loughlin  
Rothwell, Figg, Ernst & Manbeck, P.C.  
607 14th Street, NW  
Suite 800  
Washington, D.C. 20005

*Attorneys for Applicant*

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Motion to Amend Application Pursuant to TBMP § 605.03(b) has been served by First Class mail, postage prepaid, to

Sarah G. Voeller  
Curtis B. Hamre  
Hamre, Schumann, Mueller & Larson P.C.  
P.O. Box 2902  
Minneapolis, MN 55402

On this 26th day of June, 2015.



Leo M. Loughlin