

ESTTA Tracking number: **ESTTA721617**

Filing date: **01/20/2016**

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

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	The Echo Design Group, Inc.		
Entity	Corporation	Citizenship	New York
Address	10 East 40th Street New York, NY 10016 UNITED STATES		

Attorney information	Edward F. Maluf Seyfarth Shaw LLP 620 8th Ave 32nd Floor New York, NY 10018 UNITED STATES bosippto@seyfarth.com Phone:212-218-4658		
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Applicant Information

Application No	86203632	Publication date	12/22/2015
Opposition Filing Date	01/20/2016	Opposition Period Ends	01/21/2016
Applicant	Echoes & Angels, LLC 1611 South Utica Avenue, #122 Tulsa, OK 74104 UNITED STATES		

Goods/Services Affected by Opposition


Class 025. First Use: 2012/01/05 First Use In Commerce: 2013/08/22
All goods and services in the class are opposed, namely: T-shirts; T-shirts for men, women, children

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	524118	Application Date	04/05/1948
Registration Date	04/18/1950	Foreign Priority Date	NONE
Word Mark	ECHO		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 1928/03/05 First Use In Commerce: 1928/03/05 WOMEN'S SHAWLS AND SCARFS

U.S. Registration No.	634072	Application Date	07/19/1954
Registration Date	09/04/1956	Foreign Priority Date	NONE

Word Mark	ECHO ORIGINATIONS
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Design Mark	
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Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 1928/00/00 First Use In Commerce: 1928/00/00 SCARFS, SQUARES, TIES, SHAWLS, STOLES, SHRUGS, CAPES, MANTLES, MANTILLAS, NECKERCHIEF

U.S. Registration No.	1184921	Application Date	11/03/1980
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Registration Date	01/05/1982	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1976/00/00 First Use In Commerce: 1976/00/00 SCARFS		

U.S. Registration No.	1382222	Application Date	05/22/1985
Registration Date	02/11/1986	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1968/00/00 First Use In Commerce: 1968/00/00 COSTUME AND SEMI-PRECIOUS JEWELRY, NAMELY, SCARF RINGS, [BRACELETS,] PINS, RINGS, NECKLACES, EARRINGS, BROOCHES AND BELT BUCKLES MADE IN WHOLE OR IN PART OF PRECIOUS OR SEMI-PRECIOUS METALS		

U.S. Registration No.	1422006	Application Date	03/19/1986
Registration Date	12/23/1986	Foreign Priority Date	NONE
Word Mark	CLUB 7 ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1986/02/28 First Use In Commerce: 1986/02/28 SCARFS AND BELTS		

U.S. Registration No.	1422953	Application Date	03/19/1986
Registration Date	12/30/1986	Foreign Priority Date	NONE
Word Mark	SIGNATURE ECHO		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 1986/02/28 First Use In Commerce: 1986/02/28 SCARFS AND BELTS

U.S. Registration No.	1835887	Application Date	04/18/1991
Registration Date	05/10/1994	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 024. First use: First Use: 1992/08/27 First Use In Commerce: 1992/08/27 draperies, curtains, bed linens; namely, sheets, pillowcases, bedspreads and textile piece goods; namely, cotton, wool,silk, linen and synthetics for use in the manufacture of bed linens, home furnishings, table linens and clothing Class 027. First use: First Use: 1992/12/10 First Use In Commerce: 1992/12/10 wallpaper		

U.S. Registration No.	2016227	Application Date	11/03/1994
Registration Date	11/12/1996	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1995/08/09 First Use In Commerce: 1995/08/09 leather goods, namely handbags, purses,wallets, key and credit card cases Class 025. First use: First Use: 1995/08/09 First Use In Commerce: 1995/08/09 leather belts		

U.S. Registration No.	2051802	Application Date	11/03/1994
Registration Date	04/15/1997	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			

Description of Mark	NONE
Goods/Services	Class 018. First use: First Use: 1994/02/28 First Use In Commerce: 1994/02/28 hand bags, namely tote bags, [overnight bags,] * and * shoulder bags [and sling bags]

U.S. Registration No.	2080360	Application Date	08/25/1995
Registration Date	07/15/1997	Foreign Priority Date	NONE

Word Mark	ECHO
Design Mark	

Description of Mark	NONE
Goods/Services	Class 016. First use: First Use: 1996/01/02 First Use In Commerce: 1996/01/05 paper products, namely [appointment books], photo albums, diaries, address books, wedding journals and albums, guest books, memory books, brag books, stationery products, namely stationery, envelopes, and printed invitations and announcements, notebooks, memo pads, score pads, bridge tallies and playing cards, gift wrapping paper, gift tags and notes, shopping bags, kitchen related paper products, namely paper towels and napkins, [babyrecord products, namely baby record books, printed growth charts, memo boards, infant annual growth calendars (undated),] and kitchen related products, namely [coupon holders], recipe card books, [and recipe books] Class 020. First use: First Use: 1996/01/02 First Use In Commerce: 1996/01/05 paper dishes, namely, paper plates and paper cups

U.S. Registration No.	2255183	Application Date	01/23/1998
Registration Date	06/22/1999	Foreign Priority Date	NONE

Word Mark	ECHO SOFT
Design Mark	

Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 1998/01/11 First Use In Commerce: 1998/01/11 Clothing, namely, scarves, hats, gloves, mufflers, wraps and shawls

U.S. Registration No.	2646159	Application Date	03/05/1999
Registration Date	11/05/2002	Foreign Priority Date	NONE


Word Mark	ECHO
Design Mark	

Description of Mark	NONE
Goods/Services	Class 027. First use: First Use: 2001/10/00 First Use In Commerce: 2002/04/00 [CARPETING AND] RUGS

U.S. Registration No.	3323796	Application Date	11/19/2002
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Registration Date	10/30/2007	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 003. First use: First Use: 2003/04/00 First Use In Commerce: 2004/02/00 Perfumery, namely, perfume, eau de toilette, scented skin care lotions and creams; shower gel; after shave balms; personal deodorants and anti-perspirants		

U.S. Registration No.	3344954	Application Date	04/08/2003
Registration Date	11/27/2007	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 2006/06/01 First Use In Commerce: 2006/06/01 Luggage; carry-on bags; cosmetic bags sold empty; duffel bags; garment bags for travel; shaving bags sold empty; shoe bags for travel; suit bags; travel bags; all purpose sport bags; beach bags		

U.S. Registration No.	3418771	Application Date	12/22/2001
Registration Date	04/29/2008	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1997/12/15 First Use In Commerce: 1997/12/15 UMBRELLAS		

U.S. Registration No.	3418947	Application Date	12/22/2001
Registration Date	04/29/2008	Foreign Priority Date	NONE
Word Mark	ECHO		


Design Mark	ECHO		
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2000/03/01 First Use In Commerce: 2000/03/01 RAINWEAR, EXCLUDING RAIN BOOTS AND RAINSHOES		

U.S. Registration No.	3506354	Application Date	04/08/2003
Registration Date	09/23/2008	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark	ECHO		
Description of Mark	NONE		
Goods/Services	Class 020. First use: First Use: 2008/07/03 First Use In Commerce: 2008/07/03 Furniture		

U.S. Registration No.	3532354	Application Date	04/08/2003
Registration Date	11/11/2008	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2006/12/01 First Use In Commerce: 2006/12/01 Clothing, namely, lingerie, blouses, dresses, swimwear, hats, gloves blazers, and shorts		

U.S. Registration No.	3600069	Application Date	04/08/2003
Registration Date	03/31/2009	Foreign Priority Date	NONE
Word Mark	ECHO		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 021. First use: First Use: 1993/10/01 First Use In Commerce: 1993/10/01 containers for household or kitchen use not of precious metal; cups; non-metal decorative boxes; decorative plates; garbage cans; [paper plates;] toothbrush holders; wastepaper baskets

U.S. Registration No.	3832753	Application Date	04/22/2009
Registration Date	08/10/2010	Foreign Priority Date	NONE
Word Mark	ECHO TOUCH		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2009/05/04 First Use In Commerce: 2009/05/04 Gloves		

U.S. Registration No.	3946022	Application Date	04/08/2003
Registration Date	04/12/2011	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 003. First use: First Use: 2003/04/00 First Use In Commerce: 2004/02/00 Perfumes, colognes, toilet water, and fragrances for personal use; cosmetics; personal deodorant, body sprays and body lotion		


U.S. Registration No.	4001225	Application Date	07/15/2010
Registration Date	07/26/2011	Foreign Priority Date	NONE

Word Mark	ECHO
Design Mark	<h1>ECHO</h1>
Description of Mark	NONE
Goods/Services	Class 020. First use: First Use: 1992/08/27 First Use In Commerce: 1992/08/27 Decorative pillows Class 021. First use: First Use: 1993/10/01 First Use In Commerce: 1993/10/01 Soap dishes


U.S. Registration No.	4001238	Application Date	07/19/2010
Registration Date	07/26/2011	Foreign Priority Date	NONE

Word Mark	ECHO
Design Mark	<h1>ECHO</h1>
Description of Mark	NONE
Goods/Services	Class 020. First use: First Use: 2003/04/30 First Use In Commerce: 2003/04/30 Shower curtain hooks Class 024. First use: First Use: 1992/08/27 First Use In Commerce: 1992/08/27 Bed linens, namely, comforters, pillow covers and duvet covers; blanket throws;bath linens, namely, towels, shower curtains; table cloths not of paper, table linen, namely, napkins, place mats, table mats not of paper, fabric table runners; kitchen towels, oven mitts, pot holders; upholstery fabrics; fabric window valances and window scarves Class 027. First use: First Use: 1992/08/27 First Use In Commerce: 1992/08/27 Bath mats

U.S. Registration No.	4132313	Application Date	01/27/2010
Registration Date	04/24/2012	Foreign Priority Date	NONE

Word Mark	ECHODESIGN
Design Mark	
Description of Mark	NONE
Goods/Services	Class 021. First use: First Use: 2011/10/25 First Use In Commerce: 2011/10/25 Dinnerware and serveware, namely, plates, mugs, bowls, serving bowls, and platters

U.S. Registration No.	4132314	Application Date	01/27/2010
Registration Date	04/24/2012	Foreign Priority Date	NONE

Word Mark	ECHODESIGN
Design Mark	
Description of Mark	NONE
Goods/Services	Class 008. First use: First Use: 2011/10/25 First Use In Commerce: 2011/10/25 Flatware and cutlery, namely, forks, knives, and spoons

U.S. Registration No.	4136004	Application Date	04/08/2003
Registration Date	05/01/2012	Foreign Priority Date	NONE

Word Mark	ECHO
Design Mark	
Description of Mark	NONE
Goods/Services	Class 035. First use: First Use: 2006/06/02 First Use In Commerce: 2006/06/02 Retail store services featuring furniture, household furnishings and linens, housewares, luggage and leather accessories, clothing, glassware and dinnerware

U.S. Registration No.	4195048	Application Date	05/09/2006
Registration Date	08/21/2012	Foreign Priority Date	NONE
Word Mark	ECHO		
Design Mark	<h1>ECHO</h1>		
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2009/04/03 First Use In Commerce: 2009/04/03 sunglasses; protective carrying cases for portable music players, namely, MP3 players; cell phone cases		

U.S. Registration No.	4299142	Application Date	12/19/2011
Registration Date	03/05/2013	Foreign Priority Date	NONE
Word Mark	ECHO TEXT		
Design Mark	<h1>ECHO TEXT</h1>		
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2012/08/10 First Use In Commerce: 2012/08/10 Gloves		

U.S. Registration No.	4302410	Application Date	11/29/2011
Registration Date	03/12/2013	Foreign Priority Date	NONE
Word Mark	ECHO WARMERS		

Design Mark	<h1>ECHO WARMERS</h1>		
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2012/08/31 First Use In Commerce: 2012/08/31 Clothing, namely, scarves, gloves, mufflers, ruanas, neck bands, hats, and caps		


U.S. Registration No.	4302482	Application Date	12/19/2011
Registration Date	03/12/2013	Foreign Priority Date	NONE
Word Mark	ECHO TOUCH WARMERS		
Design Mark	<h1>ECHO TOUCH WARMERS</h1>		
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2012/08/01 First Use In Commerce: 2012/08/01 Gloves		

U.S. Registration No.	4389367	Application Date	07/03/2012
Registration Date	08/20/2013	Foreign Priority Date	NONE
Word Mark	ECHODESIGN		
Design Mark	<h1>ECHODESIGN</h1>		

Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 2012/11/15 First Use In Commerce: 2012/11/15 earbuds, earphones, headphones

U.S. Registration No.	4732348	Application Date	08/29/2013
Registration Date	05/05/2015	Foreign Priority Date	NONE

Word Mark	ECHODESIGN
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Design Mark	
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Description of Mark	NONE
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Goods/Services	Class 009. First use: First Use: 2013/06/18 First Use In Commerce: 2013/06/18 Audio speakers
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U.S. Registration No.	4855258	Application Date	04/09/2015
Registration Date	11/17/2015	Foreign Priority Date	NONE

Word Mark	ECHO
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Design Mark	
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Description of Mark	NONE
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Goods/Services	Class 025. First use: First Use: 1928/03/05 First Use In Commerce: 1928/03/05 scarfs, capes, boleros; waist wraps, namely, sashes and obis; ties for women; mufflers, wraps, ascots, ponchos, serapes, ruanas, jackets and vests
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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	/Edward F. Maluf/
Name	Edward F. Maluf
Date	01/20/2016

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

In re Application Serial No. 86/203632)	
Published in the Official Gazette of December 22, 2015)	
Mark: ECHOES & ANGELS)	
Application Filing Date: February 25, 2014)	
THE ECHO DESIGN GROUP, INC.,)	Opposition No.
Opposer,)	
v.)	
ECHOES & ANGELS, LLC,)	
Applicant.)	
)	

NOTICE OF OPPOSITION

The Echo Design Group, Inc., a corporation of the State of New York, having its principal place of business at 10 East 40th Street, New York, New York 10016 (hereinafter “Opposer”), believes that it will be damaged by registration of the mark shown in Application Serial No. 86/203632 of Echoes & Angels, LLC, a limited liability company of the State of Oklahoma, having its principal place of business at 1611 South Utica Avenue, #122, Tulsa, Oklahoma 74104 (hereinafter “Applicant”), respectively, and hereby opposes issuance of the registration in International Class 25.

As grounds for opposition, Opposer alleges as follows:

1. Since as early as 1923, Opposer and its predecessors (individually and jointly referred to as “Opposer”) have been at various times, and today are, engaged in the sale, advertising and distribution of a wide variety of fashion and home care goods, including clothing.

2. At least as early as 1928 (86 years before the 2014 filing of the Application), Opposer adopted the arbitrary and distinctive trademark ECHO for use in association with the sale, distribution and advertising of its goods.

3. At least as early as 1928, Opposer first used the trademark ECHO in association with the sale of its goods in interstate commerce, and has done so continuously since then.

4. Since at least as early as 2006, Opposer has used the mark ECHO continuously in association with the distribution, sale and advertising of its goods in interstate commerce, including, but not limited to, clothing, such as blouses, tunics, ruanas, ponchos and other tops.

5. At least as early as 2006, upon information and belief, the public and the relevant trade referred to the source of goods, including, but not limited to, clothing, such as blouses, tunics, ruanas, ponchos and other tops, and to Opposer by the mark ECHO; they have continuously done so since then; and they continue to do so today.

6. Opposer has sold and distributed substantial amounts of goods and services in association with the ECHO mark, including, but not limited to, clothing, such as blouses, tunics, ruanas, ponchos and other tops. Throughout its history, and at various times, Opposer has sold these goods under the ECHO mark at retail stores such as Macy's, Dillard's, Bloomingdale's, Nordstrom and Lord & Taylor. Annual sales of merchandise bearing the ECHO and related trademarks in the United States are in the tens millions of dollars.

7. Opposer is the owner of numerous trademarks and service marks registered on the Principal Register. As set forth in the attached Schedule A, Opposer registered its first trademark ECHO with the Office nearly 65 years ago on April 18, 1950 (Reg. No. 524,118).

Opposer now maintains a portfolio of 33 valid and subsisting ECHO and related registered marks. Of these, 14 marks are registered in connection with International Class 25, and at least 9 are incontestable. (*See* Schedule A.) As evidenced by these registrations, Opposer's ECHO marks, as used by Opposer in connection with its goods, are distinctive marks, which serve uniquely to identify Opposer as the source of its goods.

8. Opposer has sold goods, including, but not limited to, clothing, such as blouses, tunics, ruanas, ponchos and other tops in association with its ECHO marks through its website, www.echodesign.com, since at least as early as 2006.

9. Opposer's goods associated with the ECHO marks are extensively advertised throughout the United States, including national editions of *The New York Times* and other publications that are distributed across the United States.

10. Opposer's goods associated with the ECHO marks are the subject of editorial praise and have received numerous awards and other accolades.

11. As a result of the long use of the ECHO marks by Opposer, as well as its significant advertising and promotional activities resulting in extensive sales, the ECHO mark is widely recognized by the public and the trade throughout the United States.

12. Opposer has built up extensive goodwill in connection with the sale of goods, including, but not limited to, clothing, such as blouses, tunics, ruanas, ponchos and other tops, under its ECHO marks. The arbitrary and distinctive mark ECHO identifies Opposer as the source or origin of goods and services bearing, sold under, distributed and advertised in association with the ECHO mark.

13. Notwithstanding Opposer's prior rights in and to its ECHO marks, on or about February 25, 2014, Applicant filed its Application for registration of the confusingly similar mark ECHOES & ANGELS, which incorporates Opposer's ECHO mark as a dominant element. That mark was published for opposition in the Official Gazette on December 22, 2015.

14. The Application identifies its goods currently being used in commerce as "T-shirts; T-shirts for men, women, children," in International Class 25.

15. Upon information and belief, Applicant distributes and sells a portion of these goods in U.S. commerce. To the extent it does distribute and sell these goods, it does so through similar channels as the goods that are advertised, promoted, manufactured, sold and distributed by Opposer in association with the ECHO marks, and conducts business services and advertising in connection therewith.

16. By reason of Opposer's use of the ECHO marks from long prior to Applicant's filing of its application to register the confusingly similar mark ECHOES & ANGELS in association with related goods and services, Opposer has rights superior to any rights of Applicant.

CLAIM FOR RELIEF
(Likelihood of Confusion With Registered Mark)

17. Opposer repeats and realleges the allegations in preceding paragraphs 1 through 16 as if fully set forth herein.

18. The ECHOES & ANGELS mark shown in the Application so resembles Opposer's registered ECHO marks, including for example, ECHO (Reg. No. 524,118) and ECHO (Reg. No. 3,532,354), as to be likely, when used on or in connection with the goods and

services identified in International Class 25 in the Application, to cause confusion, to cause mistake, or to deceive, and Applicant's mark is thus unregistrable under Section 2(d) of the United States Trademark Act, 15 U.S.C. § 1052(d).

19. Upon information and belief, Applicant is not using the ECHOES & ANGELS mark shown in the Application as a trademark in connection with the goods identified in International Class 25.

20. The specimens submitted by Applicant in connection with the goods identified in International Class 25 show photographs of T-shirts with the ECHOES & ANGELS mark as a predominant graphic on the T-shirt, and a screen shot of the purchase of such T-shirts from CustomTshirts.com. Copies of these specimens are reproduced in Schedule B.

21. Applicant has not submitted, because it cannot submit, a specimen of a label, tag, or container for the goods, or a display associated with the goods identified in International Class 25 in the Application. (*See* Schedule B).

22. Opposer will be damaged by registration of the ECHOES & ANGELS mark shown in the Application because registration will interfere with Opposer's enjoyment of rights in and to the ECHO mark, to Opposer's substantial detriment, and will give Applicant *prima facie* evidence of its ownership of, and its exclusive nationwide right to use, a mark that is confusingly similar to Opposer's ECHO mark.

WHEREFORE, Opposer prays that its opposition be sustained and that the registration sought by Applicant in International Class 25 be refused.

Please charge any deficiency or credit any overpayment related to this Opposition to Deposit Account No. 50-2896, and direct all correspondence in connection with this opposition to the undersigned and, in addition, to:

Vincent Sireci, Esq.
General Counsel
The Echo Design Group, Inc.
10 East 40th Street
New York, NY 10016
vsireci@echodesign.com
(201) 403-9114

Respectfully submitted,

SEYFARTH SHAW LLP

Date: 01/20/2016

By: /Edward Maluf/
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Attorneys for Opposer
The Echo Design Group, Inc.

SCHEDULE A

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
1	ECHO (STYLIZED)	524,118	04/18/50	25	WOMEN'S SHAWLS AND SCARFS
2	ECHO ORIGINATIONS (AND DESIGN)	634,072	09/04/56	25	SCARFS, SQUARES, TIES, SHAWLS, STOLES, SHRUGS, CAPES, MANTLES, MANTILLAS, NECKERCHIEF
3	ECHO	1,184,921	01/05/82	25	SCARFS
4	ECHO	1,382,222	02/11/86	14	COSTUME AND SEMI-PRECIOUS JEWELRY, NAMELY, SCARF RINGS, PINS, RINGS, NECKLACES, EARRINGS, BROOCHES AND BELT BUCKLES MADE IN WHOLE OR IN PART OF PRECIOUS OR SEMI-PRECIOUS METALS
5	CLUB7 ECHO	1,422,006	12/23/86	25	SCARVES AND BELTS
6	SIGNATURE ECHO (STYLIZED)	1,422,953	12/30/86	25	SCARFS AND BELTS

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
7	ECHO	1,835,887	05/10/94	24, 27	DRAPERIES, CURTAINS, BED LINENS; NAMELY, SHEETS, PILLOWCASES, BEDSPREADS AND TEXTILE, PIECE GOODS; NAMELY, COTTON, WOOL, SILK, LINEN AND SYNTHETICS FOR USE IN THE MANUFACTURE OF BED LINENS, HOME FURNISHINGS, TABLE LINENS AND CLOTHING; WALLPAPER
8	ECHO	2,016,227	11/12/96	18, 25	LEATHER GOODS, NAMELY HANDBAGS, PURSES, WALLETS, KEY AND CREDIT CARD CASES; LEATHER BELTS
9	ECHO	2,051,802	04/15/97	18	HAND BAGS, NAMELY TOTE BAGS, AND SHOULDER BAGS
10	ECHO	2,080,360	07/15/97	16, 20	PAPER PRODUCTS, NAMELY, PHOTO ALBUMS, DIARIES, ADDRESS BOOKS, WEDDING JOURNALS AND ALBUMS, GUEST BOOKS, MEMORY BOOKS, BRAG BOOKS, STATIONERY PRODUCTS, NAMELY STATIONERY, ENVELOPES, AND PRINTED INVITATIONS AND ANNOUNCEMENTS, NOTEBOOKS, MEMO PADS, SCORE PADS, BRIDGE TALLIES AND PLAYING CARDS, GIFT WRAPPING PAPER, GIFT TAGS AND NOTES, SHOPPING BAGS, KITCHEN-RELATED PAPER PRODUCTS, NAMELY PAPER TOWELS AND NAPKINS, AND KITCHEN-RELATED PRODUCTS, NAMELY, RECIPE CARD BOOKS

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
11	ECHO SOFT	2,255,183	06/22/99	25	CLOTHING, NAMELY, SCARVES, HATS, GLOVES, MUFFLERS, WRAPS AND SHAWLS
12	ECHO	2,646,159	11/05/02	27	RUGS
13	ECHO	3,323,796	10/30/07	03	PERFUMERY, NAMELY, PERFUME, EAU DE TOILETTE, SCENTED SKIN CARE LOTIONS AND CREAMS; SHOWER GEL; AFTER SHAVE BALMS; PERSONAL DEODORANTS AND ANTIPERSPIRANTS
14	ECHO	3,344,954	11/27/07	18	LUGGAGE; CARRY-ON BAGS; COSMETIC BAGS SOLD EMPTY; DUFFEL BAGS; GARMENT BAGS FOR TRAVEL; SHAVING BAGS SOLD EMPTY; SHOE BAGS FOR TRAVEL; SUIT BAGS; ALL PURPOSE SPORT BAGS; BEACH BAGS
15	ECHO	3,418,771	04/29/08	18	UMBRELLAS
16	ECHO	3,418,947	04/29/08	25	RAINWEAR, EXCLUDING RAIN BOOTS AND RAIN SHOES
17	ECHO	3,506,354	09/23/08	20	FURNITURE
18	ECHO	3,532,354	11/11/08	25	CLOTHING, NAMELY, LINGERIE, BLOUSES, DRESSES, SWIMWEAR, HATS, GLOVES BLAZERS, AND SHORTS

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
19	ECHO	3,600,069	03/31/09	21	CONTAINERS FOR HOUSEHOLD OR KITCHEN USE NOT OF PRECIOUS METAL; CUPS; NON-METAL DECORATIVE BOXES; DECORATIVE PLATES; GARBAGE CANS; PAPER PLATES, TOOTHBRUSH HOLDERS' WASTEPAPER BASKETS
20	ECHO TOUCH	3,832,753	08/10/10	25	GLOVES
21	ECHO	3,946,022	04/12/11	03	PERFUMES, COLOGNES, TOILET WATER, AND FRAGRANCES FOR PERSONAL USE; COSMETICS; PERSONAL DEODORANT, BODY SPRAYS AND BODY LOTION
22	ECHO	4,001,225	07/26/11	20, 21	DECORATIVE PILLOWS, SOAP DISHES, TOWEL HOLDERS
23	ECHO	4,001,238	07/26/11	20, 24, 27	SHOWER CURTAIN HOOKS; BED LINENS, NAMELY, COMFORTERS, PILLOW COVERS AND DUVET COVERS; BLANKET THROWS; BATH LINENS, NAMELY TOWELS, SHOWER CURTAINS AND BATH MATS; TABLE CLOTHS NOT OF PAPER, TABLE LINEN, NAMELY, NAPKINS, PLACE MATS, TABLE MATS NOT OF PAPER, FABRIC TABLE RUNNERS; KITCHEN TOWELS, OVEN MITTS, POT HOLDERS, APRONS; UPHOLSTERY FABRICS; FABRIC WINDOW VALANCES AND WINDOW SCARVES; BATHMATS

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
24	ECHODESIGN	4,132,313	04/24/12	21	DINNERWARE AND SERVEWARE, NAMELY, PLATES, MUGS, BOWLS, SERVING BOWLS, AND PLATTERS
25	ECHODESIGN	4,132,314	04/24/12	8	FLATWARE AND CUTLERY, NAMELY FORKS, KNIVES, AND SPOONS
26	ECHO	4,136,004	05/01/12	35	RETAIL STORE SERVICES FEATURING FURNITURE, HOUSEHOLD FURNISHINGS AND LINENS, HOUSEWARES, LUGGAGE AND LEATHER ACCESSORIES, CLOTHING, GLASSWARE, DINNERWARE
27	ECHO	4,195,048	08/21/12	9	SUNGLASSES; PROTECTIVE CARRYING CASES FOR PORTABLE MUSIC PLAYERS, NAMELY, MP3 PLAYERS; CELL PHONE CASES
28	ECHO TEXT	4,299,142	03/05/13	25	GLOVES
29	ECHO WARMERS	4,302,410	03/12/13	25	SCARVES, GLOVES, MUFFLERS, RUANAS, NECK BANDS, HATS AND CAPS
30	ECHO TOUCH WARMERS	4,302,482	03/12/13	25	GLOVES

	MARK	REG. NO.	REG. DATE	CLASS	GOODS
31	ECHODESIGN	4,389,367	08/20/13	9	EARBUDS, EARPHONES, HEADPHONES
32	ECHODESIGN	4,732,348	05/05/15	9	AUDIO SPEAKERS
33	ECHO	4,855,258	11/17/15	25	SCARFS, CAPES, BOLEROS; WAIST WRAPS, NAMELY, SASHES AND OBIS; TIES FOR WOMEN; MUFFLERS, WRAPS, ASCOTS, PONCHOS, SERAPES, RUANAS, JACKETS AND VESTS

SCHEDULE B





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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and complete copy of the foregoing NOTICE OF OPPOSITION has been served upon the following individuals of record via First Class Mail, postage prepaid, on this 20th day of January, 2016:

Jessica V. Hunt
1611 South Utica Avenue, #162
Tulsa, OKLAHOMA UNITED
STATES 74104

Email: huntjessicav@gmail.com

/Edward Maluf/

Edward F. Maluf