

ESTTA Tracking number: **ESTTA1078391**

Filing date: **08/28/2020**

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

Proceeding	91263757
Party	Defendant WORKS LIMITED
Correspondence Address	KRISTIN J. ACHTERHOF & CATHERINE E. O'BRIEN KATTEN MUCHIN ROSENMAN LLP 525 WEST MONROE STREET CHICAGO, IL 60661 UNITED STATES Primary Email: kristin.achterhof@katten.com Secondary Email(s): catherine.obrien@katten.com, deborah.wing@katten.com, chi-tmuspto@katten.com 312-902-5200
Submission	Withdrawal Of Application
Filer's Name	Kristin J. Achterhof
Filer's email	kristin.achterhof@katten.com, deborah.wing@katten.com, chi-tmuspto@katten.com, trademarks@fenwick.com, lwilliams@fenwick.com
Signature	/Kristin J. Achterhof/
Date	08/28/2020
Attachments	145642331_1 - UPTOWORK.pdf(5303 bytes )

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

**Opposition Proceeding: 91263757**

In re application of )  
Works Limited )  
Mark: UPTOWORK )  
Serial No.: 88/445,825 )  
Filed: May 24, 2019 )

**APPLICANT’S REQUEST FOR ABANDONMENT OF APPLICATION WITHOUT  
WRITTEN CONSENT, PURSUANT TO OPPOSITION PROCEEDING**

Applicant, Works Limited, (“Applicant”) pursuant to 37 CFR § 2.68 agrees to voluntarily abandon its registration application for its mark UPTOWORK, Serial No.: 88/445,825, (the “Mark”) filed with the United States Patent and Trademark Office on January 8, 2018. The Mark is presently the subject of a pending opposition proceeding (Opposition No. 91263757) filed by Opposer, Upwork Inc., against Applicant’s pending registration application.

Applicant hereby requests the U.S. Patent and Trademark Office expressly abandon the UPTOWORK registration application. Applicant has not obtained the written consent of Opposer and understands that pursuant to 37 C.F.R. 2.135, abandonment of its registration application will result in judgement being entered against the Applicant.

[Signature page to follow]

Respectively submitted,

WORKS LIMITED

By:     /Kristin J. Achterhof/      
Kristin J. Achterhof  
Attorney for Applicant  
Katten Muchin Rosenman LLP  
525 West Monroe Street  
Chicago, Illinois 60661  
kristin.achterhof@katten.com

CERTIFICATE OF SERVICE

I, Kristin J. Achterhof, hereby certify that on this 28<sup>th</sup> day of August 2020, a true copy of the foregoing Petitioner's Request for Abandonment of Application Without Written Consent, Pursuant to Opposition Proceeding was served on Opposer's attorneys by email at [trademarks@fenwick.com](mailto:trademarks@fenwick.com) and [lwilliams@fenwick.com](mailto:lwilliams@fenwick.com).

Executed on August 28, 2020

\_\_\_\_\_/Kristin J. Achterhof/\_\_\_\_\_  
Kristin J. Achterhof