

ESTTA Tracking number: **ESTTA1137778**

Filing date: **06/02/2021**

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

Proceeding	91269483
Party	Defendant Washington Redwolves LLC
Correspondence Address	PHILIP MARTIN MCCAULAY 815 N PATRICK ST UNIT 209 ALEXANDRIA, VA 22314 UNITED STATES Primary Email: martinmccaulay@hotmail.com Secondary Email(s): washingtonpigskins@gmail.com 240-543-5932
Submission	Answer
Filer's Name	Philip Martin McCaulay
Filer's email	martinmccaulay@hotmail.com, washingtonpigskins@gmail.com
Signature	/Philip Martin McCaulay/
Date	06/02/2021
Attachments	Washington Redwolves LLC answer 06 02 2021 1649.pdf(2722673 bytes )

Philip Martin McCaulay, the owner of Washington Redwolves LLC, is currently using the mark Washington Redwolves Professional Gridiron Football with serial number 90054904 in commerce for shirts. The logo for the Arkansas State Red Wolves has a snarling wolf head facing the front. The logo for Washington Redwolves Professional Gridiron Football with serial number 90054904 has a silhouette of a howling wolf. McCaulay questions whether any consumer would ever purchase a Washington Redwolves Professional Gridiron Football shirt thinking that they were getting an Arkansas State Red Wolves shirt.



**Washington  
Redwolves**



**Professional  
Gridiron  
Football**

McCaulay respectfully requests that his application for Washington Red Wolves with serial number 90042499 for football games be abandoned due to Arkansas State's concerns over a likelihood of confusion.

1. Paragraph 1 contains facts.

2. Paragraph 2 contains facts.

3. Paragraph 3 contains facts.

4. Paragraph 4 contains facts.

5. Paragraph 5 contains facts.

6. Paragraph 6 contains facts.

7. Paragraph 7 contains facts.

8. Paragraph 8 contains facts.

9. Paragraph 9 contains facts.

10. Paragraph 10 contains facts.

11. Paragraph 11 contains facts.

12. After the New York Post referred to McCaulay as the trademark hog, McCaulay co-opted and embraced the ironic nickname. This is like the LGBTQ community co-opting the word queer when it was previously a term expressing contempt or disapproval. It is like someone embracing being called a redneck by a comedian when the word was originally meant as an insult.

13. The nickname Trademark Hog is an ironic nickname. McCaulay is not a greedy person. It is like a man who is bald having the ironic nickname Curly or a large person having the ironic nickname Tiny. Curly Howard from the Three Stooges and Curly Neal from the Harlem Globetrotters were bald. Little John from Robin Hood's Band of Merry Men was quite large.

14. Paragraph 14 contains facts.

15. As of June 2, 2021, McCaulay has fifty-nine (59) currently pending or registered trademarks, including forty-four (44) that are currently in use, ten (10) that are not in use, and five (5) that are suspended.

Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University

	Serial Number	Registration Number	Mark	Status
1	90246483		PROPERTY OF WASHINGTON REDWOLVES LLC A VIRGINIA COMPANY	Filing basis 1(b), currently in use.
2	90058576	6336873	TRADEMARK HOG	Registered, currently in use.
3	86291873	4693537	WASHINGTON AMERICANS	Partial Section 8 affidavit, currently in use.
4	86975968	4718236	WASHINGTON AMERICANS	Section 15 and Partial Section 8 affidavits, currently in use.
5	86290058	4693536	WASHINGTON AMERICANS	Section 8 affidavit, currently in use.
6	86741621	4932353	WASHINGTON ARROWS	Registered, currently in use.
7	90252140		WASHINGTON BURGUNDY WOLVES	Filing basis 1(b), currently in use.
8	90239649		WASHINGTON BURGUNDY WOLVES	Filing basis 1(b), currently in use.
9	90067976		WASHINGTON FEDERALS	Filing basis 1(b), not currently in use.
10	86632196	4877341	WASHINGTON FEDERALS	Registered, currently in use.
11	90290912		WASHINGTON FOOTBALL CLUB	Filing basis 1(b), currently in use.
12	86442991	4733519	WASHINGTON FOOTBALL CLUB	Section 8 affidavit, currently in use.
13	90527601		WASHINGTON FOOTBALL WOLVES	Filing basis 1(a), currently in use.
14	86405916	4740998	WASHINGTON FORCES	Section 8 affidavit, currently in use.
15	86632169	4877339	WASHINGTON FOUNDERS	Registered, currently in use.
16	86443020	4801219	WASHINGTON GLADIATORS	Section 8 affidavit, currently in use.
17	90067988		WASHINGTON LIBERTY	Filing basis 1(b), not currently in use.
18	90180232		WASHINGTON LOBOS ROJOS	Filing basis 1(b), currently in use.
19	90214655		WASHINGTON LUPI RUFİ	Filing basis 1(b), currently in use.
20	90036691		WASHINGTON MONUMENTS	Filing basis 1(b), not currently in use.

Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University

	Serial Number	Registration Number	Mark	Status
21	86632171	4877340	WASHINGTON MONUMENTS	Section 15 and Section 8 affidavits, currently in use.
22	86443527	4801222	WASHINGTON NATIVES	Registered, not currently in use.
23	86397934	4749736	WASHINGTON PANDAS	Registered, currently in use.
24	86352233	4740948	WASHINGTON PANDAS	Section 8 affidavit, currently in use.
25	86270135	4796289	WASHINGTON PIGSKINS	Section 8 affidavit, currently in use.
26	90042499		WASHINGTON RED WOLVES	Filing basis 1(b), not currently in use.
27	86397918	4733334	WASHINGTON RED-TAILED HAWKS	Section 15 and Section 8 affidavits, currently in use.
28	86316385	4705397	WASHINGTON RED-TAILED HAWKS	Section 8 affidavit, currently in use.
29	90039207		WASHINGTON REDTAILS	Filing basis 1(b), currently in use.
30	90053275		WASHINGTON REDTAILS	Filing basis 1(b), currently in use.
31	90048050		WASHINGTON REDTAILS	Filing basis 1(b), currently in use.
32	90036248		WASHINGTON REDTAILS	Filing basis 1(b), not currently in use.
33	90161592		WASHINGTON REDWOLVES	Filing basis 1(b), currently in use.
34	90161583		WASHINGTON REDWOLVES	Filing basis 1(b), currently in use.
35	90161772		WASHINGTON REDWOLVES AWOOOO!	Filing basis 1(b), currently in use.
36	90330268		WASHINGTON REDWOLVES FOUNDATION	Filing basis 1(a), currently in use.
37	90326988		WASHINGTON REDWOLVES FOUNDATION	Filing basis 1(a), currently in use.
38	90060507		WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(a), currently in use.
39	90054904		WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), currently in use.
40	90073478		WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), currently in use.

Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University

	Serial Number	Registration Number	Mark	Status
41	90073990		WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), not currently in use.
42	86316664	4690031	WASHINGTON RENEGADES GRIDIRON FOOTBALL	Section 8 affidavit, currently in use.
43	90066713		WASHINGTON SENTINELS	Filing basis 1(b), currently in use.
44	90254277		WASHINGTON SHAPESHIFTING WOLVES	Filing basis 1(b), currently in use.
45	90267272		WASHINGTON SHAPESHIFTING WOLVES	Filing basis 1(b), not currently in use.
46	86295838	4676737	WASHINGTON SHARKS	Section 8 affidavit, currently in use.
47	90036682		WASHINGTON VETERANS	Filing basis 1(b), not currently in use.
48	86397940	4749737	WASHINGTON VETERANS	Section 15 and Section 8 affidavits, currently in use.
49	86682822		WASHINGTON WARRIORS	Suspended
50	86309983		WASHINGTON WARRIORS	Suspended
51	86282350		WASHINGTON WARRIORS	Suspended
52	86297047		WASHINGTON WARRIORS	Suspended
53	86277930		WASHINGTON WARRIORS	Suspended
54	90256986		WASHINGTON WOLFDogs	Filing basis 1(b), currently in use.
55	90503042		WASHINGTON WOLVES	Filing basis 1(a), currently in use.
56	90239440		WASHINGTON WOLVES	Filing basis 1(b), currently in use.
57	90238852		WASHINGTON WOLVES	Filing basis 1(b), currently in use.
58	90238888		WASHINGTON WOLVES	Filing basis 1(b), not currently in use.
59	90261138		WASHINGTON WOLVES (OR ANY WOLF VARIANT)	Filing basis 1(b), currently in use.

**Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University**

16. As of June 2, 2021, McCaulay’s company Washington Redwolves LLC has twenty-five (25) currently pending trademarks, including twenty-one (21) currently in use and four (4) not currently in use, and one registered trademark in use with a Section 8 affidavit.

Serial Number	Mark	Status
1	90246483 PROPERTY OF WASHINGTON REDWOLVES LLC A VIRGINIA COMPANY	Filing basis 1(b), currently in use.
2	90252140 WASHINGTON BURGUNDY WOLVES	Filing basis 1(b), currently in use.
3	90239649 WASHINGTON BURGUNDY WOLVES	Filing basis 1(b), currently in use.
4	90527601 WASHINGTON FOOTBALL WOLVES	Filing basis 1(a), currently in use.
5	90180232 WASHINGTON LOBOS ROJOS	Filing basis 1(b), currently in use.
6	90214655 WASHINGTON LUPI RUFU	Filing basis 1(b), currently in use.
7	90042499 WASHINGTON RED WOLVES	Filing basis 1(b), not currently in use.
8	90161592 WASHINGTON REDWOLVES	Filing basis 1(b), currently in use.
9	90161583 WASHINGTON REDWOLVES	Filing basis 1(b), currently in use.
10	90161772 WASHINGTON REDWOLVES AWOOOO!	Filing basis 1(b), currently in use.
11	90330268 WASHINGTON REDWOLVES FOUNDATION	Filing basis 1(a), currently in use.
12	90326988 WASHINGTON REDWOLVES FOUNDATION	Filing basis 1(a), currently in use.
13	90060507 WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(a), currently in use.
14	90054904 WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), currently in use.
15	90073478 WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), currently in use.
16	90073990 WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL	Filing basis 1(b), not currently in use.
17	90254277 WASHINGTON SHAPESHIFTING WOLVES	Filing basis 1(b), currently in use.
18	90267272 WASHINGTON SHAPESHIFTING WOLVES	Filing basis 1(b), not currently in use.
19	90256986 WASHINGTON WOLFDOGS	Filing basis 1(b), currently in use.
20	90503042 WASHINGTON WOLVES	Filing basis 1(a), currently in use.
21	90239440 WASHINGTON WOLVES	Filing basis 1(b), currently in use.
22	90238852 WASHINGTON WOLVES	Filing basis 1(b), currently in use.
23	90238888 WASHINGTON WOLVES	Filing basis 1(b), not currently in use.
24	90261138 WASHINGTON WOLVES (OR ANY WOLF VARIANT)	Filing basis 1(b), currently in use.
25	90290912 WASHINGTON FOOTBALL CLUB	Filing basis 1(b), currently in use.
26	86442991 WASHINGTON FOOTBALL CLUB	Section 8 affidavit, currently in use.

17. Paragraph 17 contains facts.

18. McCaulay is not affiliated with the Washington Football Team (WFT). He has no association, endorsement, authorization, approval, sponsorship, licensing, or any other connection to the WFT.

19. On July 4, 2020, McCaulay sent an email to the National Football League (NFL) at the email address [trademarkmatters@nfl.com](mailto:trademarkmatters@nfl.com) with a list of the registered trademarks they could have for free.

### Free Trademarks

Martin McCaulay <martinmccaulay@hotmail.com>

Sat 7/4/2020 6:42 PM

To: trademarkmatters@nfl.com <trademarkmatters@nfl.com>

Here is a list of the registered trademarks you can have for free.

Martin

Philip Martin McCaulay  
815 N Patrick St Unit 209  
Alexandria, VA 22314  
240-543-5932

Serial Number	Reg. Number	Word Mark	Live/Dead
<a href="#">86397918</a>	<a href="#">4733334</a>	<a href="#">WASHINGTON RED-TAILED HAWKS</a>	<a href="#">LIVE</a>
<a href="#">86975968</a>	<a href="#">4718236</a>	<a href="#">WASHINGTON AMERICANS</a>	<a href="#">LIVE</a>
<a href="#">86741621</a>	<a href="#">4932353</a>	<a href="#">WASHINGTON ARROWS</a>	<a href="#">LIVE</a>
<a href="#">86632196</a>	<a href="#">4877341</a>	<a href="#">WASHINGTON FEDERALS</a>	<a href="#">LIVE</a>
<a href="#">86632171</a>	<a href="#">4877340</a>	<a href="#">WASHINGTON MONUMENTS</a>	<a href="#">LIVE</a>
<a href="#">86632169</a>	<a href="#">4877339</a>	<a href="#">WASHINGTON FOUNDERS</a>	<a href="#">LIVE</a>
<a href="#">86443527</a>	<a href="#">4801222</a>	<a href="#">WASHINGTON NATIVES</a>	<a href="#">LIVE</a>
<a href="#">86443020</a>	<a href="#">4801219</a>	<a href="#">WASHINGTON GLADIATORS</a>	<a href="#">LIVE</a>
<a href="#">86270135</a>	<a href="#">4796289</a>	<a href="#">WASHINGTON PIGSKINS</a>	<a href="#">LIVE</a>
<a href="#">86328533</a>	<a href="#">4770243</a>	<a href="#">WASHINGTON AMERICANS</a>	<a href="#">LIVE</a>
<a href="#">86397940</a>	<a href="#">4749737</a>	<a href="#">WASHINGTON VETERANS</a>	<a href="#">LIVE</a>
<a href="#">86397934</a>	<a href="#">4749736</a>	<a href="#">WASHINGTON PANDAS</a>	<a href="#">LIVE</a>
<a href="#">86405916</a>	<a href="#">4740998</a>	<a href="#">WASHINGTON FORCES</a>	<a href="#">LIVE</a>
<a href="#">86352233</a>	<a href="#">4740948</a>	<a href="#">WASHINGTON PANDAS</a>	<a href="#">LIVE</a>
<a href="#">86442991</a>	<a href="#">4733519</a>	<a href="#">WASHINGTON FOOTBALL CLUB</a>	<a href="#">LIVE</a>
<a href="#">86316385</a>	<a href="#">4705397</a>	<a href="#">WASHINGTON RED-TAILED HAWKS</a>	<a href="#">LIVE</a>
<a href="#">86291873</a>	<a href="#">4693537</a>	<a href="#">WASHINGTON AMERICANS</a>	<a href="#">LIVE</a>
<a href="#">86290058</a>	<a href="#">4693536</a>	<a href="#">WASHINGTON AMERICANS</a>	<a href="#">LIVE</a>
<a href="#">86316664</a>	<a href="#">4690031</a>	<a href="#">WASHINGTON RENEGADES GRIDIRON FOOTBALL</a>	<a href="#">LIVE</a>
<a href="#">86295838</a>	<a href="#">4676737</a>	<a href="#">WASHINGTON SHARKS</a>	<a href="#">LIVE</a>

20. McCaulay is not affiliated with the Washington Football Team (WFT). He has no association, endorsement, authorization approval, sponsorship, licensing, or any other connection to the WFT.



21. As of June 2, 2021, McCaulay has pending trademark applications for fourteen (14) marks such as Washington Wolves or other wolf variants including thirteen (13) that are currently in use for at least one category of goods and one (Washington Red Wolves with serial number 90042499) that is not in use.

	Mark
1	PROPERTY OF WASHINGTON REDWOLVES LLC A VIRGINIA COMPANY
2	WASHINGTON BURGUNDY WOLVES
3	WASHINGTON FOOTBALL WOLVES
4	WASHINGTON LOBOS ROJOS
5	WASHINGTON LUPI RUFİ
6	WASHINGTON RED WOLVES
7	WASHINGTON REDWOLVES
8	WASHINGTON REDWOLVES AWOOOO!
9	WASHINGTON REDWOLVES FOUNDATION
10	WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL
11	WASHINGTON SHAPESHIFTING WOLVES
12	WASHINGTON WOLFDogs
13	WASHINGTON WOLVES
14	WASHINGTON WOLVES (OR ANY WOLF VARIANT)

22. McCaulay is currently using the mark Washington Redwolves Professional Gridiron Football in commerce for shirts. Links to purchase Washington Redwolves Professional Gridiron Football shirts are on the website <https://washingtonredwolvesprofessionalgridironfootball.com/> in the section titled Washington Wolves Online Retail Store Services.

Online listings for purchasing the shirts are at <https://www.ebay.com/itm/363277390227> and <https://www.ebay.com/itm/363307724000>. The shirts are available in maroon or gold in men's sizes S, M, L, XL, 2XL, 3XL, and 4XL; women's sizes S, M, L, 2XL, and 3XL; and Youth sizes XS, S, M, L, and XL.

The cost of production for one shirt is \$5.32 which includes \$3.53 per blank shirt, \$1.66 for an iron-on transfer, and \$0.13 for a clothing label. The shirts are for sale for \$20 plus postage. The price minus the cost of production is \$14.68 per shirt.

Washington Redwolves LLC has low overhead because McCaulay prepares and files any required government forms and ensures compliance with all regulations, procures and creates the merchandise, handles the logistics, and maintains the websites. McCaulay has run a profitable online retail business since the year 2006. His business has been covered globally by ABC, CBS, NBC, FOX, ESPN, CNN, CTV, the BBC, and others; and has been the subject of over 100 articles in English, Spanish, French, German, Italian, and Portuguese, including articles in parody websites such as The Onion. His websites had over 130,000 visits in a single month.

Currently, the only person in charge of sales for Washington Redwolves LLC is McCaulay. He may look for individuals to assist with company social media support, online marketing support, and graphic design. The company will increase awareness to targeted customers through online advertising and proactive public relations campaigns.

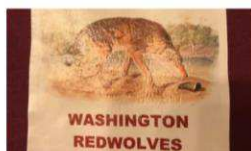


## Cotton Tee Shirts

Available in gold or maroon in Men's sizes S, M, L, XL, 2XL, 3XL, and 4XL; Women's sizes S, M, L, XL, 2XL, and 3XL; and Youth sizes XS, S, M, L, and XL.

90% OF THE SALES WILL BENEFIT THE WOLF CONSERVATION CENTER

WASHINGTON REDWOLVES SHIRTS



\$20 plus postage, 90% goes to charity.

[BUY WASHINGTON REDWOLVES SHIRTS HERE](#)

WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL SHIRTS



\$20 plus postage, 90% goes to charity.

[BUY WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL SHIRTS HERE](#)

WASHINGTON REDWOLVES AWOOOO! SHIRTS

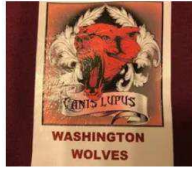


\$20 plus postage, 90% goes to charity.

[BUY WASHINGTON REDWOLVES AWOOOO! SHIRTS HERE](#)

Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University

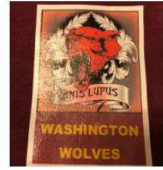
WASHINGTON WOLVES SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON WOLVES SHIRTS HERE —

WASHINGTON WOLVES SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON WOLVES SHIRTS HERE —

WASHINGTON SHAPESHIFTING WOLVES SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON SHAPESHIFTING WOLVES SHIRTS HERE —

WASHINGTON WOLFDOGS SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON WOLFDOGS SHIRTS HERE —

WASHINGTON WOLVES (OR ANY WOLF VARIANT) SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON WOLVES (OR ANY WOLVES VARIANT) HERE —

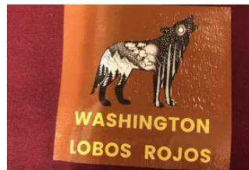
WASHINGTON BURGUNDY WOLVES



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON BURGUNDY WOLVES SHIRTS HERE —

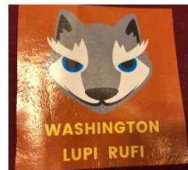
WASHINGTON LOBOS ROJOS SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON LOBOS ROJOS SHIRTS HERE —

WASHINGTON LUPI RUFI SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON LUPI RUFI SHIRTS HERE —

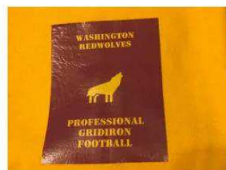
PROPERTY OF WASHINGTON REDWOLVES LLC A VIRGINIA COMPANY SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON REDWOLVES LLC A VIRGINIA COMPANY SHIRTS HERE —

WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL SHIRTS HERE —

WASHINGTON WOLVES SHIRTS



\$20 plus postage, 90% goes to charity.

— BUY WASHINGTON WOLVES SHIRTS HERE —

WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL MUGS



\$10 plus postage, 10% goes to charity.

— BUY WASHINGTON REDWOLVES PROFESSIONAL GRIDIRON FOOTBALL MUGS HERE —

5/29/2021 Washington Redwolves Professional Gridiron Football Shirt black & white logo | eBay

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Your item is for sale

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**Listing info**

Page views: 181  
 Duration: Good till cancelled  
 Start time: Jan 30, 2021 19:32:26 PST

**Washington Redwolves Professional Gridiron Football Shirt black & white logo**

Condition: **New with tags**

Fit:

Manufacturer Color:

Quantity:  [Last one / 0 sold](#)

Price: **US \$20.00**

[Sale benefits charity](#) | [Ships from United States](#)

Shipping: **\$7.01 Economy Shipping** | [See details](#)  
From location: Alexandria, Virginia, United States  
 Dest. to: United States | [See shipping](#)

Delivery: **Estimated between Wed, Jun. 09 and Sat, Jun. 12 to 52354**

Payments: [Earn up to 5x points when you use your eBay Mastercard!](#) | [Learn more](#)

Returns: [Seller does not accept returns](#) | [See details](#)

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 Get the item you ordered or get your money back. [Learn more](#)

**Seller information**  
[washingtonredwolves \(0\)](#)

Contact seller  
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[Description](#) | [Shipping and payments](#) | [Report item](#)

Seller assumes all responsibility for this listing. eBay item number: 363277390227

Last updated on Mar 30, 2021 19:32:52 PST [View all revisions](#)

**90% of the sale of this item will benefit Wolf Conservation Center**

The WCC's mission is to promote wolf conservation by teaching about wolves, their relationship to the environment and the human role in protecting their future.

**ebay FOR CHARITY**

- Official eBay for Charity listing | [Learn more](#)
- Sale benefits a verified non-profit partner

**Item specifics**

Condition:	New with tags: A brand-new, unused, and unworn item (including handmade items) in the original packaging (such as ... <a href="#">Read more</a> )	Size:	2XL
Color:	Gold or Maroon	Department:	Unisex Adults
Sleeve length:	Short Sleeve	Material:	Cotton
Brand:	Washington Redwolves Professional Gridiron/Football	Type:	T-Shirt
Size Type:	Regular		

Washington Redwolves Professional Gridiron Football cotton tee shirts to promote a professional gridiron football team available in gold or maroon in XL, 2XL, 3XL, and 4XL; women's sizes S, M, L, 2XL, and 3XL; and Youth sizes XS, S, M, L, and XL

<https://www.ebay.com/itm/363277390227?hash=item5485051193:g:8lQAADSw7AxgO7Kf> 1/2



Your item is for sale

- Revise your item
- Sell a similar item
- Create shipping discounts

**Listing info**  
 Page views: 208  
 Duration: Good 'til cancelled  
 Start time: Feb 28, 2021 07:20:27 PST

**Washington Redwolves Professional Gridiron Football Shirt burg. & gold logo**



Condition: **New with tags**  
 Fit: - Select -  
 Manufacturer Color: - Select -  
 Quantity: 1 [Last one / 0 sold](#)

Price: **US \$20.00** [Buy It Now](#)  
[Add to cart](#)  
[Add to Watchlist](#)

Shop with confidence  
 eBay Money Back Guarantee  
 Get the item you ordered or get your money back. [Learn more](#)

**Seller information**  
 washingtonredwolves (0)  
 Contact seller  
 See other items

Shipping: \$7.01 Economy Shipping [See details](#)  
 From location: Alexandria, Virginia, United States  
 Ships to: United States [See locations](#)

Delivery: Estimated between **Wed, Jun. 09** and **Sat, Jun. 12** to 2234

Payments: [Earn up to 5% points when you use your eBay Mastercard! \[Learn more\]\(#\)](#)

Returns: [Seller does not accept returns](#) | [See details](#)

Have one to sell? [Sell now](#)

Description Shipping and payments Report item

Seller assumes all responsibility for this listing. eBay item number: 36330724000



**90% of the sale of this item will benefit Wolf Conservation Center**

The WCC's mission is to promote wolf conservation by teaching about wolves, their relationship to the environment and the human role in protecting their future.

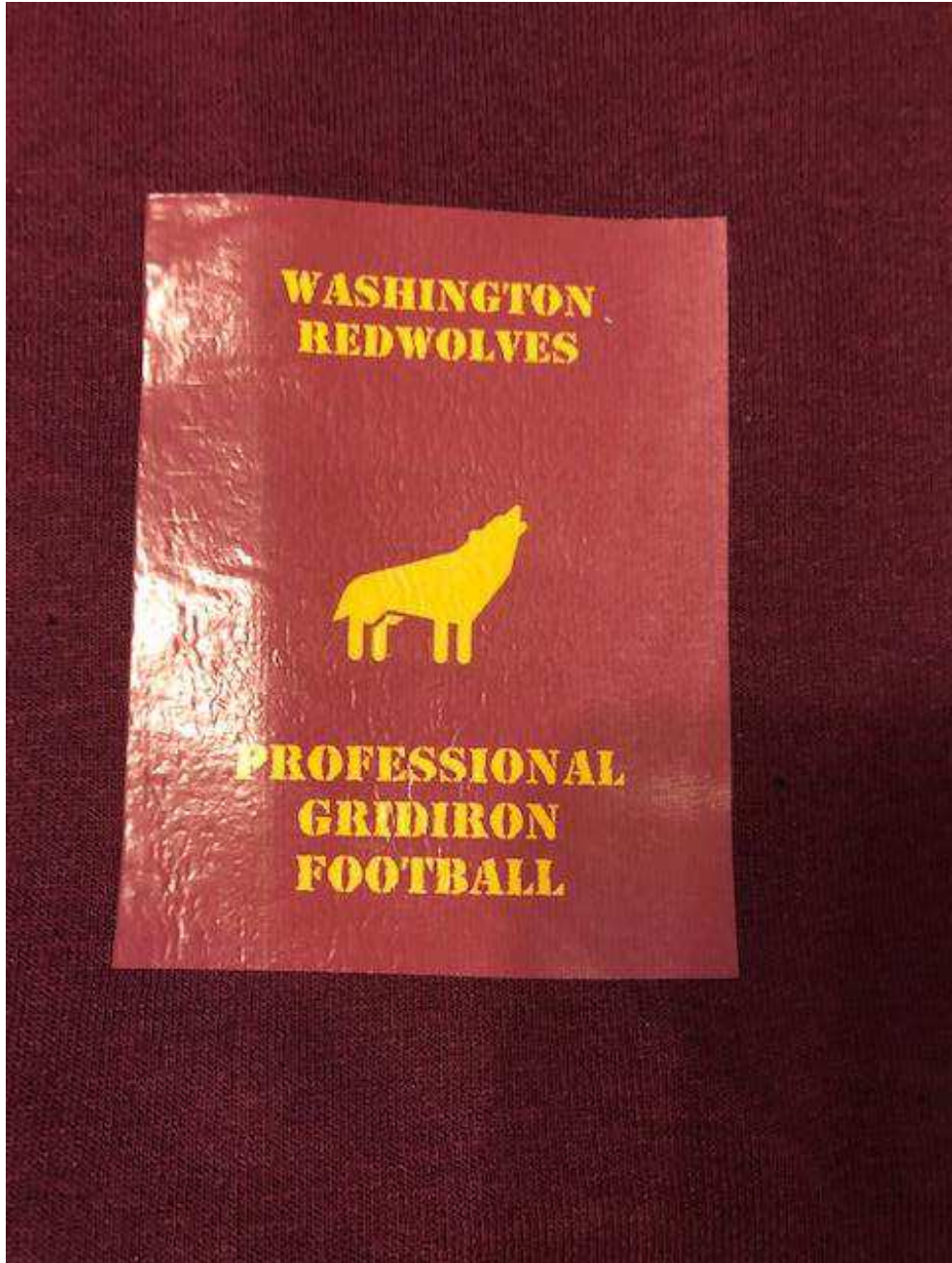
**eBay FOR CHARITY**

- Official eBay for Charity listing | [Learn more](#)
- Sale benefits a verified non-profit partner

**Item specifics**

Condition:	New with tags: A brand new, unused, and unworn item (excluding handmade items) in the original packaging (such as ... <a href="#">Read more</a> )	Size:	2XL
Color:	Gold or Maroon	Department:	Unisex Adults
Sleeve Length:	Short Sleeve	Material:	Cotton
Brand:	Washington Redwolves Professional Gridiron Football	Type:	T-Shirt
Size Type:	Regular		

Washington Redwolves Professional Gridiron Football cotton tee shirts to promote a professional gridiron football team available in gold or maroon in XL, 2XL, 3XL, and 4XL; women's sizes S, M, L, 2XL, and 3XL; and Youth sizes XS, S, M, L and XL





























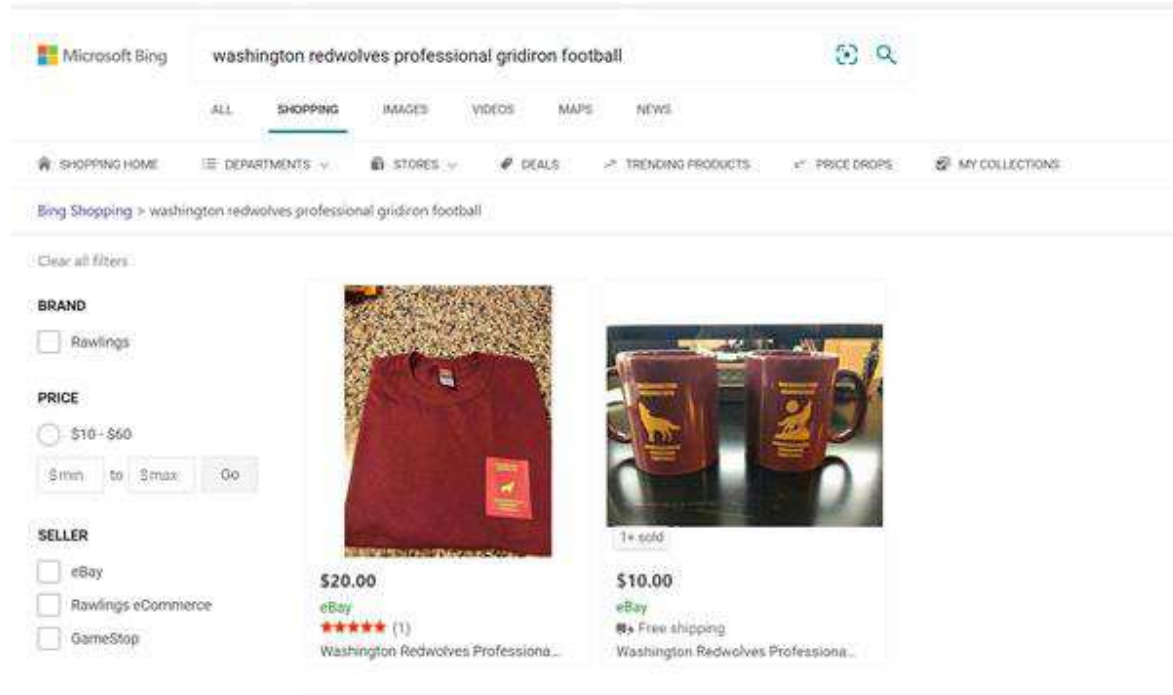




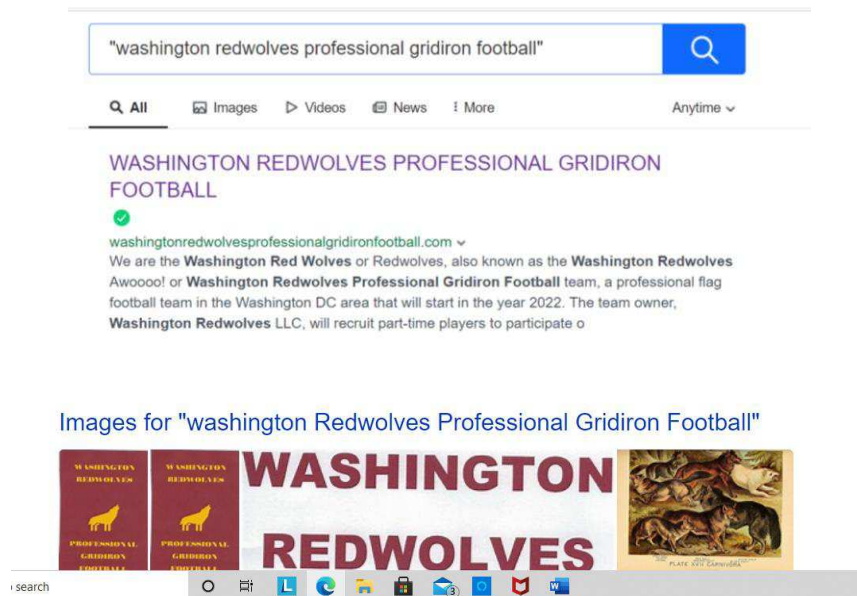




A search using Microsoft Bing for Washington Redwolves Professional Gridiron Football without quotes shows McCaulay's listings for shirts and cups as the first two items under the shopping tab.

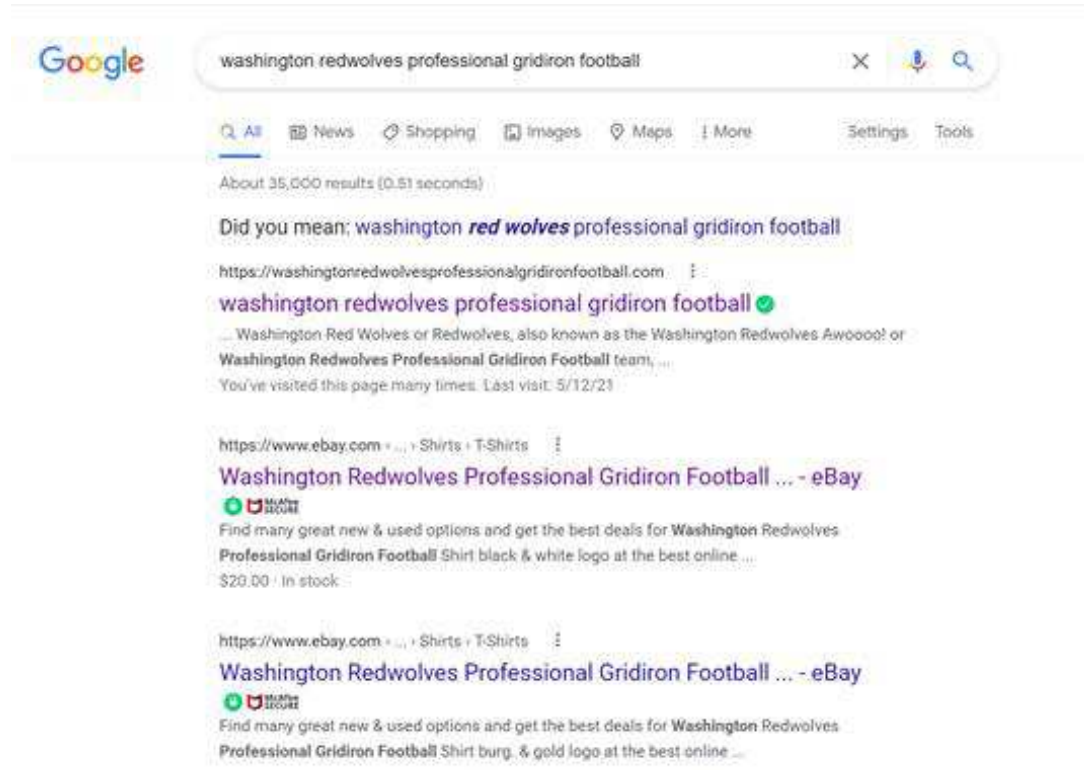


A search using Yahoo for "Washington Redwolves Professional Gridiron Football" in quotes shows McCaulay's website as the first item and McCaulay's logo as the first item under images.

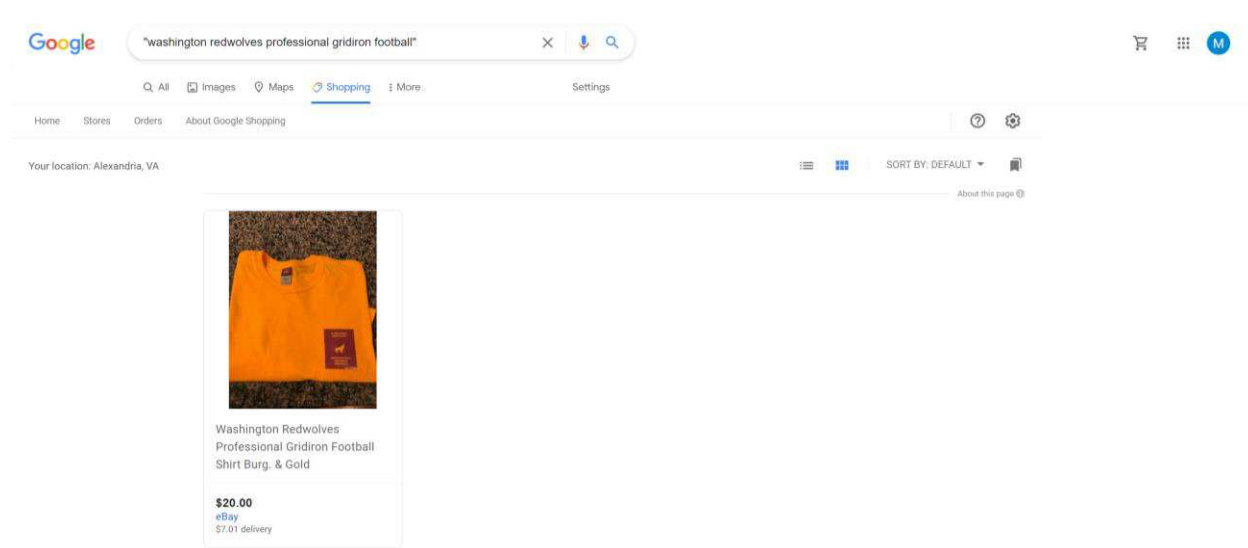


Washington Redwolves LLC Answer to Opposition Number 91269483 filed by Arkansas State University

A search using Google for Washington Redwolves Professional Gridiron Football without quotes shows a link to McCaulay’s website first and links to purchase shirts second and third.



A search using Google for “Washington Redwolves Professional Gridiron Football” in quotes under the shopping tab shows a link to a listing for McCaulay’s shirts.



Regarding the application for the mark Washington Red Wolves with serial number 90042499 for football games, McCaulay had already contacted two flag football leagues, the DC Fray and the Flag Football World Championship Tour, who both agreed to let McCaulay sponsor teams with his names.

23. McCaulay repeats each answer from paragraphs 1 to 22.

24. Paragraph 24 contains facts.

25. Paragraph 25 contains facts.

26. Paragraph 26 contains facts.

27. Paragraph 27 contains facts.

28. McCaulay questions whether there is a likelihood of confusion between shirts having the Washington Redwolves Professional Gridiron Football logo and shirts having the Arkansas State Red Wolves logo. The Arkansas State logo has a snarling wolf head facing front. McCaulay's logo has the silhouette of a howling wolf. McCaulay respectfully requests that Arkansas State's opposition to serial number 90054904 for shirts be rejected, allowing McCaulay to register serial number 90054904 for shirts.







**Washington  
Redwolves**



**Professional  
Gridiron  
Football**



**Washington  
Redwolves**



**Professional  
Gridiron  
Football**





A Red Wolves logo is also used by the Chattanooga Red Wolves SC, Paw Paw Red Wolves, Indiana University East Red Wolves, Loveland Red Wolves, Capital City Red Wolves, Salem Red Wolves, Cedar Ridge Red Wolves, and Conrad Red Wolves.





The United States Department of Defense has units named the Red Wolves including the 336th Training Squadron Red Wolves at Keesler Air Force Base and the Helicopter Sea Combat Squadron 84 (HSC-84) Red Wolves former helicopter squadron of the United States Navy Reserve. The Arkansas State Red Wolves logo looks more like the insignia for the 336th Training Squadron Red Wolves than the logo for Washington Redwolves Professional Gridiron Football.





I hereby certify that a true and complete copy of the foregoing answer has been served on

STEPHEN D. SCHRANTZ of SCHRANTZ LAW FIRM, PLLC by forwarding said copy on June 2, 2021, via email

to: [steve@schrantzlaw.com](mailto:steve@schrantzlaw.com).

Signature:     /Philip Martin McCaulay/  
Philip Martin McCaulay  
Principal  
Washington Redwolves LLC