

ESTTA Tracking number: **ESTTA437836**

Filing date: **10/26/2011**

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

**Petition for Cancellation**

Notice is hereby given that the following party requests to cancel indicated registration.

**Petitioner Information**

Name	Venturi Automobiles		
Entity	Corporation	Citizenship	Monaco
Address	7, rue de Gabian Monaco, MC98000 MONACO		

Attorney information	Stacey R. Halpern Knobbe, Martens, Olson & Bear, LLP 2040 Main Street, 14th Floor Irvine, CA 92614 UNITED STATES efiling@kmob.com Phone:949-760-0404
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**Registration Subject to Cancellation**

Registration No	606303	Registration date	05/24/1955
Registrant	GENERAL MOTORS LLC 300 RENAISSANCE CENTER DETROIT, MI 482653000 UNITED STATES		

**Goods/Services Subject to Cancellation**

Class U019 (International Class 012). First Use: 1953/11/19 First Use In Commerce: 1953/11/19 All goods and services in the class are cancelled, namely: AUTOMOBILES
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**Grounds for Cancellation**

Abandonment	Trademark Act section 14
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Attachments	2011-10-26 Petition for Cancellation - ARTH1-002ZUS.pdf ( 3 pages )(299701 bytes )
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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	/Stacey R. Halpern/
Name	Stacey R. Halpern
Date	10/26/2011



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

Venturi Automobiles,  
Petitioner,  
v.  
General Motors LLC,  
Respondent.

) I hereby certify that this correspondence and all marked attachments are  
) being electronically filed with the Trademark Trial and Appeal Board  
) through their web site located at <http://esita.uspto.gov> on:  
)  
) \_\_\_\_\_  
) October 26, 2011  
) (Date)  
)  
)   
) \_\_\_\_\_  
) Stacey R. Halpern  
)  
)

**PETITION FOR CANCELLATION**

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

Dear Sir or Madam:

Petitioner, Venturi Automobiles, a Monaco corporation (“Venturi”) believes that it has been and will continue to be damaged by continued registration of the mark shown in U.S. Trademark Registration No. 0606303 for the mark BONNEVILLE for goods in International Class 12 (hereinafter the “Registration”) owned by General Motors LLC (“Respondent”) and hereby petitions to cancel such Registration.

A description of the Registration is as follows:

Mark	:	BONNEVILLE (Stylized)
Reg. No.	:	0606303
Reg. Date	:	May 24, 1955
Int’l. Class	:	12
Goods	:	AUTOMOBILES

As grounds for cancellation, it is alleged that:

1. On information and belief, Respondent has abandoned the mark shown in Registration No. 0606303 by discontinuing use of said mark in the United States in connection

with the goods listed in the registration with no intent to initiate or resume said use. Accordingly, Venturi believes that the mark has been abandoned and U.S. Trademark Registration No. 0606303 should be canceled.

2. Venturi is the owner of U.S. Trademark Application Serial No. 85028546 for the mark VENTURI FETISH BONNEVILLE in connection with “electric cars; electric vehicles, namely, electric land vehicles” (the “’546 Application”).

3. Venturi has been, and continues to be, damaged in that Respondent’s Registration No. 0606303 has been cited against the ’546 Application as a basis for refusal of registration under Trademark Act Section 2(d). As a result of the refusal by the United States Patent and Trademark Office to register Venturi’s mark, Venturi has been damaged and will continue to be damaged by such refusal to register.

4. Venturi’s attempt to register the mark shown in the ’546 Application will be impaired by the continued registration of said abandoned mark of Respondent.


5. In view of Respondent’s non-use of the mark shown in Registration No. 0606303, Respondent is not entitled to registration of the mark pursuant to Section 14(3) of the Trademark Act, 15, U.S.C. § 1064(3), and as such, said registration should be canceled.

WHEREFORE, Venturi prays that U.S. Trademark Registration No. 0606303 be canceled and that this Petition for Cancellation be sustained in favor of Venturi.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: October 26, 2011

By:   
Stacey R. Halpern  
2040 Main Street, 14<sup>th</sup> Floor  
Irvine, California 92614  
(949) 760-0404  
efiling@kmob.com

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing **PETITION FOR CANCELLATION** to be served upon Respondent, Respondent's Attorney of Record and Respondent's Correspondent of Record by depositing one copy thereof in the United States Mail on October 26, 2011, addressed as follows:

Charles H. Ellerbrock  
General Motors Corporation  
MC#482-C230-B21  
300 Renaissance Center  
Detroit MI 48265-3000

General Motors LLC  
300 Renaissance Center  
Detroit MI 48265-3000



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Stacey R. Halpern