

ESTTA Tracking number: **ESTTA1132274**

Filing date: **05/07/2021**

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 has filed a petition to cancel the registration indicated below.

Petitioner Information

Name	Redd Solutions, LLC		
Entity	Limited Liability Company	Citizenship	Maryland
Address	7315 WISCONSIN AVENUE SUITE 400W BETHESDA, MD 20814 UNITED STATES		
Attorney information	DIONNE HEARD GERBEN PERROTT PLLC 1050 CONNECTICUT AVE. NW SUITE 500 WASHINGTON, DC 20036 UNITED STATES Primary Email: dheard@gerbenlawfirm.com Secondary Email(s): jgerben@gerbenlawfirm.com 2024947414		
Docket Number			

Registration Subject to Cancellation

Registration No.	5343110	Registration date	11/28/2017
International Registration No.	NONE	International Registration Date	NONE
Registrant	Red Commerce Limited 51 GRESHAM STREET FIRST FLOOR LONDON EC2V 7EL UNITED KINGDOM		

Goods/Services Subject to Cancellation

Class 035. First Use: 0 First Use In Commerce: 0 All goods and services in the class are subject to cancellation, namely: Business consultancy relating to the administration of information technology, professional business consultancy, business management consultancy, business consultancy to firms, consultancy relating to personnel management, professional recruitment services
Class 042. First Use: 0 First Use In Commerce: 0 All goods and services in the class are subject to cancellation, namely: Consultancy services relating to information technology, technical consultancy services relating to information technology

Grounds for Cancellation

Abandonment	Trademark Act Section 14(3)
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Attachments	REDSOLUTION - Petition to Cancel.pdf(258935 bytes)
Signature	/Dionne Heard/
Name	Dionne Heard
Date	05/07/2021

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

Redd Solutions, LLC

Petitioner,

v.

Red Commerce Limited

Registrant,

Cancellation No.:

Mark: REDSOLUTION

Registration No: 5343110

PETITION TO CANCEL

Redd Solutions, LLC (“Petitioner”) hereby petitions for the cancellation of Registration No. 5343110 for the mark REDSOLUTION, registered to Red Commerce Limited (“Registrant”), and states as follows:

1. Petitioner is a Maryland limited liability company.
2. The United States Patent and Trademark Office (“USPTO”) records identify Registrant, a United Kingdom limited liability company with an address of 51 Gresham Stree, First Floor London EC2V 7EL as the owner of U.S. Registration No. 5343110 (“Registrant’s Registration”) for the mark REDSOLUTION (“Registered Mark”), for “Business consultancy relating to the administration of information technology, professional business consultancy, business management consultancy, business consultancy to firms, consultancy relating to personnel management, professional recruitment services” in International Class 35 and “Consultancy services relating to information technology, technical consultancy services relating to information technology” in International Class 42 (“Registrant’s Services”).

3. Petitioner applied to register its “REDD SOLUTIONS” trademark and was assigned serial number 88936235 (“Petitioner’s Application”).

4. On September 4, 2020, Petitioner’s Application was issued a refusal based on a likelihood of confusion with Registered Mark.

ABANDONMENT

5. Registrant has abandoned the mark without intent to resume use of the mark.

6. Upon information and belief, Registrant has not offered Registrant’s Services in connection with the Registered Mark since 2013.

7. Upon information and belief, Registrant has abandoned the Registered Mark with no intent to resume use and, therefore, the Registered Mark is abandoned and no longer entitled to continued registration with the USPTO.

8. Petitioner’s research has uncovered the following factual basis for its claims. All allegations made on information and belief may be proven with information solely within control of Registrant:

- a. Petitioner’s search of the internet finds no advertising or offerings for goods or services bearing the Registered Mark in the United States.
- b. Petitioner’s search of the relevant marketplaces finds no advertising or offerings for goods or services bearing the Registered Mark in the United States.
- c. Registrant’s current website, <https://www.redsapsolutions.com/> is now using a design mark with the wording “20 Years of Red” and there is no evidence of the Registered Mark on Registrant’s current website. (Exhibit A)
- d. Petitioner’s search of the internet finds the last use of Registrant’s Mark in the background of a Youtube video dated 2013. (Exhibit B)

9. By reason of all the foregoing, Petitioner will be gravely damaged by the continued registration of the Registered Mark.

WHEREFORE, Petitioner is damaged by U.S. Registration No. 5343110 prays that the same be cancelled immediately, and that this Petition for Cancellation be sustained in favor of Petitioner.

Dated: May 7, 2021

Respectfully submitted,

Dionne Heard

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Exhibit A

The screenshot shows the top portion of the RED website. At the top, a red navigation bar contains the text "COVID-19 Update: A message from our CEO --" on the left and "English" on the right. Below this, the "20 years of red" logo is on the left, and navigation icons for a menu, phone, and email are on the right, followed by a "Login/Register" link. The main hero section features a dark grey background with a large, stylized red arrow pointing right. The text "RED ranked 3rd best tech recruiter" is prominently displayed in white. Below this text is a teal "READ MORE" button. To the right of the arrow is a "Job Search" link with a magnifying glass icon. On the far right, a vertical red sidebar contains social media icons for LinkedIn, Facebook, and Twitter, along with a "Contact us" link. At the bottom of the hero section, a paragraph of text reads: "As a global leader in sourcing and placing SAP professionals, we process thousands of job openings. Our team of experienced and knowledgeable consultants match exacting role specifications to perfectly suited SAP professionals." In the bottom right corner, there is a small white box with the text "Help us improve by sharing your feedback." and a red smiley face icon.

COVID-19 Update: A message from our CEO --

English

20 years of red

☰ ☎ ✉ Login/Register

RED ranked 3rd best tech recruiter

Job Search

READ MORE

As a global leader in sourcing and placing SAP professionals, we process thousands of job openings. Our team of experienced and knowledgeable consultants match exacting role specifications to perfectly suited SAP professionals.

Help us improve by sharing your feedback.

Exhibit B



Luke Marson at SAPinsider Amsterdam 2013 speaking with Red Commerce

324 views · Jun 25, 2013

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RED - The Global SAP Solutions Provider
172 subscribers

SUBSCRIBE

Hans Eg Løkkegaard of RedSolution, the SAP consulting arm of Red Commerce, spoke with SAP Mentor Luke Marson at SAPinsider 2013 in Amsterdam.

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