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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	FeraDyne Outdoors, LLC		
Entity	LIMITED LIABILITY COMPANY	Citizenship	Delaware
Address	101 MAIN STREET SUPERIOR, WI 54880 UNITED STATES		

Attorney information	STEPHEN R. BAIRD GREENBERG TRAURIG, LLP 90 SOUTH SEVENTH STREET, SUITE 3500 MINNEAPOLIS, MN 55402 UNITED STATES Primary Email: gtipmail@gtlaw.com Secondary Email(s): bairds@gtlaw.com, wesemand@gtlaw.com 6122599700
Docket Number	185545094500

Registration Subject to Cancellation

Registration No.	5278221	Registration date	08/29/2017
Registrant	Precision Shooting Equipment, Inc. 2727 N. FAIRVIEW TUCSON, AZ 85705 UNITED STATES		

Goods/Services Subject to Cancellation

Class 028. First Use: 2016/10/01 First Use In Commerce: 2016/10/01
All goods and services in the class are subject to cancellation, namely: Archery bows

Grounds for Cancellation

Abandonment	Trademark Act Section 14(3)

Attachments	Petition for Cancellation - INFINITY.pdf(473334 bytes)

Signature	/DHW/
Name	Draeke H. Weseman
Date	11/02/2021

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

In re U.S. Registration Number 5,278,221
Mark: INFINITY
Registered: August 29, 2017

FeraDyne Outdoors, LLC, Petitioner, vs. Precision Shooting Equipment, Inc., Respondent.	Cancellation No. _____

PETITION FOR CANCELLATION

FeraDyne Outdoors, LLC, through undersigned counsel, files this petition for cancellation pursuant to Section 14(3) of the Trademark Act, 15 U.S.C. § 1064(3) and 37 C.F.R. § 2.111.

The grounds for this petition are as follows:

1. FeraDyne Outdoors, LLC ("Petitioner") is a Delaware limited liability company principally located at 101 Main Street, Superior, Wisconsin 54880.

2. Precision Shooting Equipment, Inc. ("Respondent") is a corporation of Delaware having its address of record at 2727 N. Fairview, Tucson, Arizona 85705.

3. Respondent is the owner of record for U.S. Reg. No. 5,278,221 (the "Registration") for the standard character mark INFINITY (the "Registered Mark") for "Archery bows" (the "Registered Goods") in International Class 28.

4. The Registration issued on August 29, 2017.

5. Petitioner is the applicant in U.S. Trademark Application Serial No. 90/350,159 (the "Application") and seeks registration of the standard character mark INFINITY ("Petitioner's

Mark") in connection with "Archery targets" in International Class 28.

6. Petitioner is being and will continue to be damaged by the Registration because it has been cited, pursuant to Section 2(d) of the Trademark Act, 15 U.S.C. § 1052(d), as grounds for refusing registration of Petitioner's Mark as applied-for in the Application.

7. On information and belief, Respondent is no longer using the Registered Mark in commerce in the United States in connection with the Registered Goods.

8. On information and belief, Respondent has not used the Registered Mark in commerce in the United States in connection with the Registered Goods for at least the last three consecutive three years.

9. On information and belief, Respondent has no bona fide intention to resume use of the Registered Mark in commerce in the United States for the Registered Goods.

10. As a result of discontinuing use of the Registered Mark in commerce in the United States in connection with the Registered Goods with no bona fide intent to resume such use, the Registered Mark has become abandoned within the meaning of Section 45 of the Trademark Act, 15 U.S.C. § 1127; and, therefore, the Registration should be cancelled.

WHEREFORE, Petitioner respectfully requests that the Board order cancellation of the Registration and grant Petitioner any further relief the Board deems equitable.

Dated: November 2, 2021

Respectfully submitted,

GREENBERG TRAURIG, LLP

/DHW/

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