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

Proceeding no.	92091526
Party	Plaintiff Heygo, Inc.
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Submission	Pleadings and Related Motions Motion to Amend Pleading/Amended Pleading
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Signature	/cmt/
Date	04/29/2026
Attachments	Amended Petition to Cancel Reg. 6959280 - HEYGO.pdf(194135 bytes)

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

In re Registration of	Virtualtrips Limited
Registration No.:	6,959,280
Registration Date:	Jan. 24, 2023
Mark:	HEYGO
Cancellation No.:	92091526

Heygo, Inc.	:
Petitioner,	:
v.	:
Virtualtrips Limited	:
Registrant / Respondent.	:

AMENDED PETITION TO CANCEL

Heygo, Inc.**,** a Delaware corporation located at 1111B S Governors Ave., Suite 48501, Dover, Delaware 19904 (hereinafter referred to as "Petitioner"), believes that it is or will be damaged by the continued registration of the trademark HEYGO, which is the subject of U.S. Trademark Registration No. 6,959,280, owned by Virtualtrips Limited, a United Kingdom private limited company with an address of 27 Old Gloucester Street, London WC1N 3AX, United Kingdom (hereinafter referred to as "Registrant"), and hereby petitions to cancel the

registration in International Classes 9, 38, 41, 42, and 45 under the provision of Section 14 of the Trademark Act of July 5, 1946, as amended, 15 U.S.C. § 1064.

As grounds for this Petition to Cancel, it is alleged that:

1. Respondent owns U.S. Reg. 6,959,280 which is registered for the following goods and services:

    - "Downloadable and recorded computer software and downloadable software applications enabling users to capture and live-stream audio and video content; downloadable and recorded computer software and downloadable software applications that enable users to make purchases; downloadable and recorded computer software and downloadable software applications that enable users to subscribe to live and pre-recorded virtual tours of places of travel and cultural interest around the world; downloadable and recorded computer software and downloadable software applications that enable users to access, post, display and share information in relation to travel destinations and places of cultural interest around the world; downloadable and recorded computer software and downloadable software applications for social networking; downloadable and recorded computer software and downloadable software applications to enable advertising and promotional services for live and pre-recorded virtual tours of places of travel and cultural interest around the world; downloadable and recorded digital media content, namely video files, audio files, graphic files and picture files; downloadable and recorded electronic and recorded multimedia publications, namely, magazines, brochures, articles, e-books, periodicals, journals, newsletters, whitepapers, reading materials, case studies in the field of travel and tourism, culture and entertainment; downloadable and recorded electronic interactive publications, namely, magazines, brochures, articles, e-books, periodicals, journals, newsletters, whitepapers, reading materials, case studies, blogs and public threads in the field of travel and tourism, culture and entertainment; downloadable and recorded printed publications in electronic readable form, namely, magazines, brochures, articles, e-books, periodicals, journals, newsletters, whitepapers, reading materials, case studies, blogs and public threads in the field of travel and tourism, culture and entertainment; downloadable image files featuring photographs and text in the field of travel and tourism, culture and entertainment; downloadable podcasts, webcasts and videocasts in the field of travel and tourism, culture and entertainment" in International Class 9;

    - "Compilation of business information in the travel, tourism and hospitality sectors; market research services; marketing, advertising and promotional services for businesses in the travel, tourism and hospitality sectors; business consultancy services; retail store services and online retail store services featuring travel souvenirs and travel gifts, namely, books, maps, postcards, clothing, bags, key holders, jewellery, toys, confectionery, foodstuffs, tea towels, decorative fridge magnets; retail store services and online retail store services featuring food, drink and prepared meals; the bringing together, for the benefit of others, travel and hospitality rate comparison information in the nature of the most current hotel, motel, guest house and bed and breakfast rates provided online enabling customers to conveniently review and compare current rates; providing business information, advisory and consultancy services in respect of all the aforesaid" in International Class 35;

    - "Provision of online forums for communications and social networking in the field of general travel and culture interest; provision of internet chat rooms, electronic bulletin boards and instant messaging services for social networking; photo and video sharing services, namely, the electronic transmission of digital photo, video and audio visual content amongst internet users; video broadcasting services; audio and video broadcasting services via the internet, namely, the broadcasting of live and pre-recorded virtual tours of places of travel and cultural interest around the world; videocasting in the nature of video broadcasting; providing information about audio and

video broadcasting, advisory and consultancy services in respect of all the aforesaid" in International Class 38;

- "Organising and operating of transportation for travel tours; providing information relating to transportation for use in travel guides and for travel information services; arranging transportation ticket reservations for travel tours; booking agency services relating to travel; providing information about modes of transportation to locations throughout the world, advisory and consultancy services in respect of all the aforesaid" in International Class 39;

- "Educational services, namely, providing lectures and workshops about travel, tourism, culture and entertainment; leisure services, namely, cooking instruction, arts and crafts instruction, cultural and music performances; entertainment services, namely, organizing social entertainment events; recreational services, namely, providing information on recreational vacations; online educational, leisure, entertainment and recreational services, namely, providing live and pre-recorded virtual guided tours of places of travel and cultural interest around the world via a website or mobile app; online educational, leisure, entertainment and recreational services, namely, providing information, reviews and recommendations relating to travel, tourism and places of cultural interest around the world, via a mobile app; organisation of educational seminars and training in the field of travel and tourism; organising and hosting of cultural events; ticket reservation services for travel and cultural events; electronic publishing services; provision of online newsletters and information in the field of general travel and culture interest; provision of online electronic publications in the nature of travel journals, brochures, blogs and magazines; production of videos and documentaries relating to places of travel and cultural interest around the world; organising and operating of guided tours; providing information relating to travel and sightseeing travel tours using virtual reality technology via a website or mobile app; travel guides and travel information services; guided travel tour and ticket reservation services; providing information about the aforesaid educational, entertainment, leisure and recreational activities and events, advisory and consultancy services in respect of all the aforesaid" in International Class 41;

- "Design and development of computer software; technical support services, namely, troubleshooting software problems; maintenance of computer software; computer software technical support services, namely, troubleshooting in the nature diagnosing computer software problems; software-as-a-service (SAAS) services featuring software that enables users to subscribe to live and pre-recorded virtual tours of places of travel and cultural interest around the world; software-as-a-service (SAAS) services featuring software that enables users to access, post, display and share information in relation to travel destinations and places of cultural interest around the world; software-as-a-service (SAAS) services featuring software for social networking; development and hosting of a website and online web hosting platform that enables users to access, post, display and share information in relation to travel destinations and places of cultural interest around the world; development and hosting of a digital web sharing platform and website to facilitate access to information, images, videos, journals, blogs, podcasts, webcasts, videocasts featuring travel and tourism content; information, advisory and consultancy services in respect of all the aforesaid" in International Class 42;

- "Provision of information featuring recommended hotels and other temporary accommodation, bars and restaurants around the world via a website or mobile app; online booking and reservation services in relation to hotels, temporary accommodation, bars and restaurants; travel agency services for reserving and booking accommodations; providing a website featuring user reviews and recommendations in respect of hotels and other temporary accommodation, bars and restaurants; information, advisory and consultancy services in respect of the aforesaid" in International Class 43; and

- "Online social networking services; online social networking services accessible by means of downloadable mobile applications; information, advisory and consultancy services in respect of the aforesaid" in International Class 45.

2. Petitioner is the owner of U.S. Trademark Application Nos. 99/735,121 and

99/735,146 filed March 31, 2026.

3. With Serial Nos. 99/735,121 and 99/735,146 Petitioner seeks to register HEYGO for the following goods and services:

- "Downloadable computer application software for mobile phones, namely, software for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding; Downloadable computer software for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding; Wearable activity trackers; Electric or electronic sensors for measuring, collecting, recording, and transmitting data relating to skiing and snowboarding activity, body position, motion, speed, altitude, geographic location, and athletic performance; Electronic sports training simulators; Satellite-aided navigation systems; GPS receivers; GPS tracking devices; GPS navigation device; Wearable global positioning system (GPS); Interactive touch screen terminals" in International Class 9;

- "Training services in the field of skiing and snowboarding; Virtual training services in the field of skiing and snowboarding; Providing online training in the field of skiing and snowboarding; Personal coaching services in the field of skiing and snowboarding; Virtual personal coaching services in the field of improving athletic performance; Physical fitness assessment services for sports training purposes; Sports training services; Sports training; Physical education services; Conducting fitness classes; Physical fitness instruction; Personal fitness training services" in International Class 41; and

- "Providing temporary use of online non-downloadable chatbot software for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding; Providing temporary use of online non-downloadable chatbot software using artificial intelligence (AI) for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding; Advanced product research in the field of artificial intelligence (AI); Research in the field of artificial intelligence technology; Software as a service (SAAS) services featuring software using artificial intelligence (AI) for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding; Platform as a service (PAAS) featuring computer software platforms for recording, tracking, monitoring, analyzing, and visualizing skiing and snowboarding activity and performance data, including speed, altitude, geographic location, motion, and body position data, and for providing AI-generated training analysis, personalized training recommendations, coaching guidance, performance scores, downloadable images, and instructional content in the field of skiing and snowboarding" in International Class 42.

4. Petitioner has standing to bring this cancellation proceeding. Although no Office Action has issued citing the registration at issue as a bar to Petitioner's applications, Petitioner has a real interest in the proceeding and a reasonable belief of damage within the meaning of 15 U.S.C. § 1064.
5. Petitioner intends to use and has applied to register a mark in connection with goods and services that are identical or closely related to those identified in the challenged registration, such that the continued registration of the cited mark is likely to cause confusion, mistake, or deception among consumers. Accordingly, Petitioner is and will be damaged by the continued registration of the mark.
6. Upon information and belief, Respondent never did or no longer uses its mark for the goods and services identified in International Classes 9, 38, 41, 42, and 45 and has abandoned its mark in International Classes 9, 38, 41, 42, and 45 pursuant to 15 U.S.C. § 1127.
7. Upon information and belief, Respondent has no intention of resuming use for the goods and services listed in International Classes 9, 38, 41, 42, and 45, therefore International Classes 9, 38, 41, 42, and 45 are subject to cancellation.

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Prayer for Relief

WHEREFORE, Petitioner respectfully that U.S. Reg. No. 6,959,280 be cancelled in part as requested above, and that this Petition for Cancellation be sustained in favor of Petitioner.

Respectfully submitted:

HEYGO, INC.

Dated: April 29, 2026

By: /cmt/

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ATTORNEY FOR HEYGO, INC.

CERTIFICATE OF ELECTRONIC FILING

I hereby certify this Amended Notice of Cancellation was electronically filed with the Trademark Trial and Appeal Board on April 29, 2026.

/cmt/
Signature