

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

MARK: WRANGLER

LAW OFFICE 119

SERIAL NO.: 86/330,672

INT'L CLASS NO.: 006

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APPLICANT: Stallion Oilfield Services Ltd.

BUSINESS ADDRESS: 950 Corbindale Road, Suite 300  
Houston, TX 77024

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***RESPONSE TO OFFICE ACTION SENT OCTOBER 24, 2014***

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

Sir:

Thank you for the Office Action sent October 24, 2014 regarding U.S. Trademark Application No. 86330672. Applicant herein addresses each issue raised in the Office Action in the order presented and respectfully requests that the application be allowed to proceed to publication.

## **Section 2(d) Refusal**

The Examining Attorney refuses registration of Applicant's mark under Trademark Act Section 2(d) on the basis that when used on or in connection with the identified goods, Applicant's mark so resembles the marks in U.S. Registration Nos. 3748298 for the mark WRANGLER and 4595915 for the mark PIPE WRANGLERS ("Cited Marks"), as to be likely to cause confusion, mistake, or deceive. Applicant respectfully traverses this refusal as set forth below.

Applicant respectfully requests that the Examining Attorney withdraw the refusal to register based on the registration of the Cited Marks on the grounds that the designated goods, namely blowout preventers and catwalks, are not related in any meaningful manner to Applicant's goods. The only similarity between Applicant's goods and the goods designated in the Cited Marks is that both are used at oil and gas drilling sites. To further emphasize this point, and to respond to the Examining Attorney's finding that Applicant's description of goods is indefinite such that the exact nature of the goods is unknown, Applicant herein amends the description of goods to clarify that the pre-fabricated skid-mounted metal enclosures are used solely for protecting personnel and not blowout preventers or catwalks.

Applicant's goods have a completely different purpose, namely protecting personnel, than the blowout preventers and catwalks designated in the registrations

of the Cited Marks. Applicant respectfully submits that the differences between Applicant's goods and the goods designated in the registrations of the Cited Marks are so vast that there cannot be any likelihood of confusion between the two marks. Indeed, as evidenced by the attached photos of a blowout preventer and catwalk, this type of massive equipment could not be protected by Applicant's personnel enclosures. A blowout preventer is bolted directly to a wellhead and a catwalk is used for conveying drill pipe and is an integral part of a drilling rig.

### **Identification of Goods**

As noted above, the Examining Attorney has indicated that the identification of goods is indefinite and must be clarified because the exact nature of the goods is unknown. Applicant hereby amends the identification to the following suggested in part by the Examining Attorney:

*Pre-fabricated skid-mounted metal enclosures solely for protecting personnel at oil and gas drilling sites.*

With this Applicant's Response to the Office Action Sent October 24, 2014, Applicant respectfully submits that the issues raised by the Examining Attorney have been fully addressed. Therefore, Applicant respectfully requests that its trademark application be allowed to proceed to publication.

