

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Pride Manufacturing Company, LLC
Mark: CHAMP
Serial No.: 88/470,607
Examining Attorney: Benjamin Roth
Law Office 122

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

RESPONSE TO OFFICE ACTION OF JULY 22, 2019

The applicant, Pride Manufacturing Company, LLC (“Applicant”) has filed to register the mark CHAMP (the “Mark”) for use in connection with “*golf tees, golf club grips, golf ball markers, golf divot repair tools*” in Class 28 (collectively, “Goods”). In an Office Action dated July 22, 2019, the United States Patent & Trademark Office (the “Office”) refused registration of Applicant’s Mark based upon a perceived likelihood of confusion with the following registration (the “Cited Mark”):

- **CHAMPKEY** (Reg. No. 5547485) registration owned by Zuosi Rao (hereinafter “Mr. Rao”) for “*golf bags; golf club grips; golf club heads; golf clubs; golf gloves; golf putter covers; golf putters; trolley bags for golf equipment; covers for golf clubs; grip tapes for golf clubs*” in Class 28 (filed November 6, 2017; first use claimed June 1, 2018).

The Office Action also cited the following prior-pending application that could serve as a bar to registration (collectively, “Prior Pending Application”):

- **CLUB CHAMP** (App. No. 88/408,693) pending application filed by Golf Gifts & Gallery, Inc. for “*golf putting cups, putting mats, chipping and driving mats and nets, tethered golf balls, golf bag covers, golf bag tags, golf ball retrievers, golf club grip tape, golf club hand grips, golf club head covers, golf tees, golf chipping nets, golf putting cups, golf club swing weights, golf bag travel covers; golf tees; golf ball markers; golf putting practice devices, namely, stroke improvement assemblies, ball returns, ball catchers, and ball setters; golf accessory kits comprised of golf tees and golf markers; golf practice nets*” in Class 28 (“CLUB” disclaimed)(filed April 30, 2019; first use claimed August 1993).

Applicant objects to the refusal on the basis of likelihood of confusion with the Cited Mark and the Prior Pending Application. Applicant respectfully requests that the Office suspend examination on the Mark pending final disposition of the Prior Pending Application.