

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Rebel Media Productions, LLC
Serial No.: 97/541,628 Examiner: Abigail Sue
Filed: August 9, 2022 Law Office 117
Mark: REBEL

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

APPLICANT'S RESPONSE TO OFFICE ACTION DATED MAY 26, 2023

The Examining Attorney has refused registration of the mark REBEL ("Applicant's Mark"). Applicant's response is set forth below.

I. REQUEST FOR SUSPENSION

Applicant's Mark has been refused because of a likelihood of confusion with the mark in U.S. Registration Nos. 5,836,094 and 6,111,873 ("Cited Registrations") and U.S. Application Serial Nos. 79/354,972, 79/361,515, 97/517,068 and 97/739,380 ("Cited Applications").

Applicant respectfully requests that the Examining Attorney suspend all further action on the Application until it is determine whether the Cited Applications register.

II. LIKELIHOOD OF CONFUSION REFUSAL

Applicant reserves its rights to respond fully to the likelihood of confusion refusal pending the requested suspension. In the meantime, Applicant respectfully disagrees with the conclusion that there is a likelihood of confusion with the Cited Registrations and Cited Applications.

III. CONCLUSION

For the foregoing reasons, Applicant requests that the Examining Attorney suspend the Application. If any unresolved issues still remain, the Examining Attorney is respectfully requested to telephone the undersigned in order to resolve said issues.

Dated: August 10, 2023

Respectfully submitted,
KELLEY DRYE & WARREN LLP
Attorneys for Applicant

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