

**TO THE DIRECTOR OF TRADEMARKS  
THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Application No.: 90016138

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Filing Date: June 26, 2020

**Applicant's Petition to Make Special**

Pursuant to TMEP § 1710.01, BPARSEMENT, LLC, a Texas limited liability company, files this petition to make special by and through its counsel, Lee B. Hunt of Brackett & Ellis, P.C. Applicant requests that Trademark Application Serial No. 90016138 be made special and subject to accelerated examination because of the existence of actual or threatened infringement.

As the attached evidence demonstrates, counterfeit goods bearing the applied-for mark and in the same or highly related international classes are for sale on multiple internet platforms. The third parties offering these goods do so without license or other legal permission to use this mark. Further, applicant has a good-faith belief that it is the exclusive rights-holder to this mark. Accelerated examination and issuance of a registration certificate is necessary for removing these infringing goods and preventing the sale of additional counterfeit items.

Accordingly, applicant requests that this application be made special.

RESPECTFULLY SUBMITTED:



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Lee B. Hunt  
Attorney of Record  
Brackett & Ellis, P.C.  
100 Main St.  
Fort Worth, Texas 76102  
State Bar of Texas No. 24082257

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