

ESTTA Tracking number: **ESTTA1392580**  
Filing date: **10/29/2024**

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

### Petition for Cancellation

Notice is hereby given that the following party has filed a petition to cancel the registration indicated below.

#### Petitioner information

|              |  |                               |       |
|--------------|--|-------------------------------|-------|
| Name         | Pastrana & Garcia  |                               |       |
| Entity       | Partnership  | Incorporated or registered in | Texas |
| Composed of: | Cristina Garcia-Chappell (US) Raul Steven Pastrana (US)                        |                               |       |
| Address      | 305 N. HEATHERWILDE BLVD. SUITE 240<br>PLFUGERVILLE, TX 78660<br>UNITED STATES |                               |       |

|                      |  |
|----------------------|--|
| Attorney information | RYAN T BEARD<br>PIERSON FERDINAND LLP<br>2021 GUADALUPE STREET, SUITE 260<br>AUSTIN, TX 78705<br>UNITED STATES<br>Primary email: ryan.beard@pierferd.com<br>Secondary email(s): ipdocketing@pierferd.com<br>5125772673 |
| Docket no.           |  |

#### Registration subject to cancellation

|                  |  |                   |            |
|------------------|--|-------------------|------------|
| Registration no. | 7350828  | Registration date | 04/09/2024 |
| Register         | Principal  |                   |            |
| Registrant       | Alonso, Vanessa<br>806 S ZARZAMORA ST.<br>SAN ANTONIO, TX 78207<br>UNITED STATES |                   |            |

#### Goods/services subject to cancellation


Class 045. First Use: Mar 4, 2022 First Use In Commerce: Mar 4, 2022  
All goods and services in the class are subject to cancellation, namely: legal services in the field of immigration, personal injury, and criminal defense

#### Grounds for cancellation

|                                      |                                       |
|--------------------------------------|---------------------------------------|
| Priority and likelihood of confusion | Trademark Act Sections 14(1) and 2(d) |
|--------------------------------------|---------------------------------------|

#### Mark cited by petitioner as basis for cancellation

|                      |          |                  |            |
|----------------------|----------|------------------|------------|
| U.S. application no. | 98421596 | Application date | 02/26/2024 |
|----------------------|----------|------------------|------------|

|                     |   |                       |      |
|---------------------|---|-----------------------|------|
| Register            | Principal   |                       |      |
| Registration date   | NONE  | Foreign priority date | NONE |
| Word mark           | LA MERA MERA ABOGADA  |                       |      |
| Design mark         |    |                       |      |
| Description of mark | NONE  |                       |      |
| Goods/services      | Class 045. First use: First Use: Jun 1, 2021 First Use In Commerce: Jun 29, 2021<br>Attorney services; Attorney services, namely, representation of clients in personal injury cases, car accidents, 18-wheeler accidents, construction accidents, drunk driving accidents, and workplace accidents |                       |      |

|             |   |
|-------------|---|
| Attachments | 98421596#TMSN.png( bytes )<br>LA MERA MERA Petition.pdf(86348 bytes ) |
|-------------|---|

|           |                 |
|-----------|-----------------|
| Signature | /Ryan T. Beard/ |
| Name      | Ryan T. Beard   |
| Date      | 10/29/2024      |

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

**In re Registration No. 7350828**  
**Mark: LA MERA MERA**  
**Issued: April 9, 2024**

**Pastrana & Garcia,**

**Petitioner,**

**v.**

**Vanessa Alonso,**

**Registrant.**

**Cancellation No.** \_\_\_\_\_

**PETITION FOR CANCELLATION**

1. Pastrana & Garcia, a company with a business address of 305 N. Heatherwilde Blvd., Suite 240, Pflugerville, Texas 78660 (“Petitioner”) is the owner of all rights in and to the mark “LA MERA MERA ABOGADA” (the “Petitioner’s Mark”).
2. Petitioner’s Mark has been used in commerce since at least June 29, 2021.
3. Petitioner’s Mark has been used in commerce for the following goods and services: “Attorney services; Attorney services, namely, representation of clients in personal injury cases, car accidents, 18-wheeler accidents, construction accidents, drunk driving accidents, and workplace accidents.”
4. Petitioner has had a pending application for registration of Petitioner’s Mark (US Serial No. 98421596) since February 26, 2024.
5. Vanessa Alonso is an individual with an address of 806 S Zarzamora St., San Antonio, Texas 78207 (“Registrant”).
6. Registrant alleges that she is the owner of the mark “LA MERA MERA” (“Registrant’s

Mark”), which was registered by her as US Registration No. 7350828 on April 9, 2024.

7. Registrant alleges that she has used Registrant’s Mark for “legal services in the field of immigration, personal injury, and criminal defense” since at least March 4, 2022.
8. Petitioner’s use of Petitioner’s Mark has priority over Registrant’s use of Registrant’s Mark given the first use dates in commerce.
9. There is a likelihood of confusion between Petitioner’s use of Petitioner’s Mark and Registrant’s use of Registrant’s Mark.
10. Registrant’s Mark was cited against Petitioner’s Mark during prosecution of Petitioner’s application for registration.
11. Petitioner therefore seeks cancellation of Registrant’s US registration for Registrant’s Mark so that Petitioner’s application for Petitioner’s Mark can be registered.

Dated: October 29, 2024

Respectfully submitted,

/s/ Ryan T. Beard  
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**Counsel for Petitioner  
Pastrana & Garcia**