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

Proceeding	91203706
Party	Defendant Washington Place LLC
Correspondence Address	JEFFREY A LINDENBAUM COLLEN IP INTELLECTUAL PROPERTY LAW PC THE HOLYOKE MANHATTAN BUILDING, 80 SOUTH HIGHLAND AVENUE OSSINING, NY 10562 UNITED STATES jlindenbaum@collenip.com, docket@collenip.com
Submission	Answer
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Signature	/Jeffrey A. Lindenbaum/
Date	07/03/2012
Attachments	N552_answer to countercounterclaim_120703.pdf (3 pages)(10942 bytes)

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

Chatham Imports, Inc.

Opposer/Respondent/Petitioner,

v.

Washington Place LLC

Applicant/Petitioner/Respondent.

Opp. No.: 91203706

Serial No. 77962565

Registration No. 3,829,294

Registration No. 3,899,559

**ANSWER TO COUNTER-COUNTERCLAIM FOR CANCELLATION OF
REGISTRATION NO. 3,899,559**

Washington Place LLC, (“Washington”) respectfully Answers the Counter-Counterclaim for Cancellation of Registration No. 3,899,559 as follows:

1. Washington admits that it asserted Registration No. 3,899,559, but denies the remaining allegations of Paragraph 1.
2. Washington denies the allegations of Paragraph 2.
3. Washington denies the allegations of Paragraph 3.
4. Washington denies the allegations of Paragraph 4.
5. Washington denies the allegations of Paragraph 5.

Washington denies that Chatham Imports, Inc. is entitled to the relief sought in its WHEREFORE clause. Except as expressly admitted herein, Applicant denies each and every allegation contained in the Petition for Cancellation, and denies that Chatham Imports, Inc. is entitled to any relief requested, and therefore demands strict proof thereof.

AFFIRMATIVE DEFENSES

1. The Petition for Cancellation is barred by waiver and/or estoppel.
2. The Petition for Cancellation is barred by laches or acquiescence.

Washington therefore prays that Chatham Imports, Inc.'s Petition for Cancellation of Registration No. 3,899,559 be denied with prejudice.

Respectfully submitted,

/Jeffrey A. Lindenbaum/
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Attorneys for Washington Place LLC

Dated: July 3, 2012

SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 03-2465.

I HEREBY CERTIFY THAT THIS CORRESPONDENCE IS BEING FILED ELECTRONICALLY WITH THE UNITED STATES PATENT AND TRADEMARK OFFICE

By: /Jeffrey A. Lindenbaum/ Dated: July 3, 2012

CERTIFICATE OF SERVICE

I, Jeffrey A. Lindenbaum, hereby certify that on July 3, 2012, I caused a true and correct copy of the foregoing Answer to Counter-Counterclaim to Petition to Cancel Registration No. 3,899,559 to be served upon Chatham Imports, LLC's Attorney of Record via first class mail, postage pre-paid, at the following address:

Peter D. Vogl, Esq.
Jones Day
222 East 41st Street
Floor 2
New York, NY 10017

/Jeffrey A. Lindenbaum/