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

|                        |   |
|------------------------|---|
| Proceeding             | 91212231  |
| Party                  | Defendant<br>VENM, LLC  |
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**CERTIFICATE OF SERVICE**

I, Konrad Sherinian, an attorney, hereby certify that on January 7, 2014, the listed documents were served on Opposer by delivering a true and correct copy thereof to the address of Opposer's Attorney by depositing the same with the United States Postal Service, postage pre-paid, via first class mail, addressed to:

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**SERVED DOCUMENTS**

- Applicant's Opposition to Opposer's Motion to Dismiss
- Certificate of Service

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

DRAGON BLEU (SARL),

Opposer,

v.

VENM, LLC,

Applicant.

Opposition No. 91212231

Application Ser. No. 85848528

**APPLICANT'S OPPOSITION TO OPPOSER'S MOTION TO DISMISS**

## **I. INTRODUCTION**

Applicant VENM, LLC (“Applicant”) seeks registration of the mark “VENM” for use on dance costumes. Presently, products using this mark are available only through Applicant’s website, which can be found at the URL [www.venm.com](http://www.venm.com). Opposer sells a variety of clothing for use in the sport of mixed martial arts under its composite mark “VENUM AND DESIGN.” This composite mark uses a snake head for its design element and a fanciful font for its word element, “VENUM” in which the “N” has its legs extending down to connote the fangs of a snake. Despite the vast differences in the markets served by Opposer and Applicant, and the significant differences between the two marks, Opposer filed the present Opposition, seeking to prevent the registration of the mark “VENM” for dance costumes.

Opposer relies upon U.S. Trademark Reg. Nos. 3,896,673, 3,927,787, 4,017,907, and U.S. Trademark Appln. Ser. No. 79/124,129 against Applicant. Given the vast differences in the markets served by Opposer and Applicant, and the differences between the two marks, this proceeding is without merit. In addition, as claimed in Applicant’s three counterclaims, the registrations asserted by Opposer were acquired through fraud, and in at least two cases, were never used by in commerce in the United States in association with the goods for which they are registered. In an attempt to preserve its flawed registrations, Opposer has filed a motion to dismiss Applicant’s counterclaim. As explained herein, Opposer’s motion to dismiss is without merit.

## **II. FACTUAL BACKGROUND**

Opposer is a French company doing business in the United States. It has relied upon, for the basis of this Opposition, three Registrations and one pending application. All of the asserted registrations and application are directed to the same composite mark; namely, the stylized word “VENUM” underneath and associated with a design of a snake’s head. VENUM

is written in a stylized font so that the ‘N’ depicts a set of fangs to the viewer. An example of Opposer’s mark is set forth below next to Applicant’s mark.



The mark “VENOM,” and its derivatives (such as “VENUM” and “VENNM”) are widely used in a variety of industries, including uses of “VENOM” on apparel, and uses of “VENUM” in areas such as shoes, ski wear, spinal braces, and dance performances. Accordingly, during prosecution, Opposer’s attorney was forced to distinguish Opposer’s mark “VENUM” from other similar marks. In particular, during the prosecution of Reg. No. 3927787, which matured from App. Ser. No. 79063381, Opposer’s VENUM mark was originally denied registration in class 25 in view of Reg. No. 3,676,523, which was already registered in class 25 for “Ski and snowboard wear.” In contesting this rejection, Opposer’s representative argued that Opposer’s use of the “VENUM” mark on martial arts and boxing clothes would not cause confusion with the use of one of many registered “VENOM” marks.

In particular, Opposer’s Representative argued the following:

Applicant respectfully submits that Applicant’s VENUM (plus design) mark is not likely to cause confusion with the cited registration for VENOM (Reg No. 3,676,523) because both marks are specifically and narrowly directed to clothing used in connection with the entirely unrelated sports of skiing and martial arts respectively, especially when cited mark coexists with a number of registered VENOM-formative marks for other sporting goods. Trademark Ser. No. 79063381, Request for Reconsideration after Final Action, at 2, attached to First Amended Answer as Exh. A (hereinafter Exh. A).

As amended, Applicant’s goods are limited to clothing used in connection with a particular sport, namely martial arts. Exh. A at 2.

These arguments were made by Opposer's Representative to convince the Examining Attorney to overcome a refusal to register VENUM on October 22, 2010. All of the other registrations and the application asserted by Opposer are directed to exactly the same mark, and all were either registered after the above arguments were made, or are still pending. *See Ser. Nos.* 79063381, 79090846, 79124129, and 79975084.

Applicant VENM is a small Illinois, LLC that sells dance costumes under its "VENM" mark by way of its website, [www.venm.com](http://www.venm.com). All of Applicant's products are directed to the popular activity of pole dancing. Applicant filed to register its mark on February 13, 2013, and it was approved for publication in the principal register on May 31, 2013. The notice of publication was mailed on July 10, 2013, and the mark was published for opposition on July 30, 2013. On August 29, 2013 Opposer filed this Opposition Proceeding without requesting an extension or contacting Applicant regarding any potential dispute. On October 7, 2013, Applicant filed its answer, and raised a counterclaim seeking cancellation of all asserted registrations.

### **III. LEGAL STANDARD**

A motion to dismiss for failure to state a claim upon which relief can be granted is a test solely of the legal sufficiency of a complaint. To withstand such a motion, a counterclaim needs to "only allege sufficient factual content that, if proved, would allow the Board to conclude, or to draw a reasonable inference that (1) the plaintiff has standing to maintain the proceeding, and (2) a valid ground exists for opposing or cancelling the mark." *Vineyard v. Caymus Medical*, 91204667 (TTAB July 12, 2013) at 3. A party in any action is not required to prove its case in a complaint or counterclaim, but merely has to give notice to its opponent of its causes of action. As such, there is no requirement of any "heightened fact pleading of specifics, but only enough facts to state a claim to relief that is plausible on its face." *Bell Atlantic v. Twombly*, 550 U.S.

544, 570 (2007). There is no requirement that anything that is pleaded be probable, only that the pleaded facts are plausible. *Twombly*, 550 U.S. at 556-557.

#### **IV. ARGUMENT**

##### **a. Applicant has properly pleaded a counterclaim for fraud against all of Opposer's marks**

Opposer's motion argues that Applicant's first counterclaim, which is captioned "First Ground – Fraudulent Statements Made During Prosecution to Conceal Lack of Distinctiveness," is an attempt by Applicant to assert two separate grounds for cancellation of Opposer's marks based on both "fraud" and "lack of distinctiveness." It actually asserts a single ground; i.e., fraud, and in particular, that fraudulent statements made by Opposer during the prosecution of its VENUM AND DESIGNs marks induced the US Trademark Office to perfect Opposer's applications. Opposer goes on to argue that Applicant "clearly fails to plead the required elements to make a fraud claim." Motion at 5. This is simply incorrect.

A proper pleading of fraud comprises allegations that (i) Opposer made a false representation to the Trademark Office, (ii) the false representation was material to the registrability of the mark; (iii) Opposer was aware of the falsity of the representation, and (iv) the false statement was made with the intention of deceiving the Trademark Office. *In re Bose Corp.*, 580 F.3d 1240, 91 USPQ 1938, 1941 (Fed. Cir. 2009.). Per Fed. R. Civ. Pro. 9(b), fraud must be pleaded with particularity. Fed. R. Civ. Pro. 9(b)(in alleging fraud or mistake, a party must state with particularity the circumstances constituting fraud or mistake).

Here all of the elements of fraud are pleaded with particularity. First, the false statements made by Opposer are identified:

48. In particular, during prosecution, Dragon Bleu's Attorney made the following representations:

- a. “Applicant respectfully submits that Applicant’s VENUM (plus design) mark is not likely to cause confusion with the cited registrations for VENOM because both marks are specifically and narrowly directed to clothing used in connection with the entirely unrelated sports of skiing and martial arts respectively, especially when cited mark coexists with a number of registered VENOM-formative marks for other sporting goods.” [...]
- b. “As amended, Applicant’s goods are limited to clothing used in connection with a particular sport, namely martial arts.” [...]

First Amended Answer at ¶ 48.

Next, it is expressly pleaded that the above statements were made to secure allowance of Reg. No. 3927787, and that the mark registered in Reg. Nos. 3896673 and 4017907 is identical to that registered in Reg. No. 3927787. First Amended Answer at ¶¶ 49-50. Accordingly, the statements were material to the registrability of not only Reg. No. 3927787, but the other registered marks as well. In addition, Applicant must have pleaded that Opposer was aware of the falsity of these statements at the time they were made, and that the statements were made with the intention of deceiving the PTO. Both of these requirements are expressly pleaded; i.e., “[o]n information and belief, at the time that the statements were made, Opposer [...] and/or its Attorney fully intended to assert the mark against those who sought registration of marks phonetically similar to “VENUM” outside of martial arts related goods.” First Amended Answer at ¶ 51.

Opposer complains that this last statement is made on information and belief. Opposer’s complaint is unavailing as Rule 9(b) expressly allows intent and other conditions of a person’s mind to be alleged generally. Fed. R. Civ. Pro. 9(b). Furthermore, the fact that the attorney who

prosecuted Reg. No. 3927787 for Opposer is the same attorney that is prosecuting this Opposition evidences this intent, as it is likely that this attorney was aware of his client's aggressive plans to assert this mark against other users of different "VENOM" marks.

Finally, Opposer appears to confuse the concept of what is required to prove a claim of fraud rather than what is required to plead a claim of fraud. At this stage, Applicant is not required to present any proof at all. Rather, the proof will be gathered after discovery.

- b. Applicant has properly pleaded that Opposer has not used any of the goods to which Reg. No. 3896673 is directed, and that Reg. No. 3,927,787 has not been used on kimonos or sport shoes, especially for the practice of martial arts.**

Opposer makes much of the fact that it registered its marks under Section 66(a) of the Trademark Act. In particular, Opposer states that use is not required for registration under Section 66(a) and thus Applicant's allegations in its second counterclaim paragraphs 61-72 are not relevant. Opposer is indeed correct that use is not required for registration of a mark under Section 66(a). However, Section 66(a) pertains to registration and not to cancellation. It is well known that Section 66(a) cannot be used as a shield to protect perfected registrations from cancellation. Opposer is incorrect in its assertions

This exact issue was addressed by the TTAB in *Saddlesprings v. Mad Croc Brands*, Cancellation No. 92055493, wherein the petitioner, Saddlesprings sought to cancel Registration No. 3,211,610 for the mark "CROC-TAIL." Mad Croc Brands was the owner of a mark for "CROC-TAIL AND DESIGN" which was perfected under Section 66(a) based on a valid international registration, and, accordingly, had not demonstrated any use of its mark prior to obtaining registration. *Saddlesprings* at 8-9. Mad Croc Brands sought to dismiss the cancellation petition, arguing that its mark could not be canceled any earlier than "the expiration of the grace period for filing an affidavit or declaration of use or excusable nonuse." In this

manner, Mad Croc Brands sought to create a cloak of “use: immunity behind Section 66(a).” *Saddlesprings* at 3. However, the TTAB found no merit to this argument, and held that a registration filed under Section 66(a) “is subject to the same grounds for cancellation as those registrations issued under Section 1 or Section 44(e)” and in doing so warned those who sought such use immunity that “Section 66(a) registrations which have never been used, or for which use has been discontinued with no intent to resume use, may be subject to cancellation for abandonment even if the international registration remains valid and subsisting.” *Saddlesprings* at 12.

Accordingly, Opposer’s marks can be at least partially canceled for the goods listed in the second counterclaim based upon lack of bona fide use as Opposer cannot claim its lack of use provided it with the requisite bona fide intent to use the marks. To plead nonuse, Applicant must have pleaded (1) the listed goods and (2) that the mark was never used on the listed goods. *Imperial Tobacco v. Phillip Morris*, 899 F.2d 1575, 1581 (Fed. Cir. 1990)(if registrant of a foreign mark fails to make use of the registered mark the presumption of abandonment may be invoked against the registrant). Applicant has averred the following with respect to Reg. No. 3,896,673:

31. Opposer’s Registration No. 3896673 is directed to classes 24 and 26.

32. With regards to class 24, Opposer claims to use the mark on “Fabrics, namely, fabrics made of cotton, microfiber, polyamide, acrylic; fabrics for textile use; velvet; bed linen; household linen; table linen not of paper; except clothing.

33. With regards to class 26, Opposer claims to use the mark on “Lace and embroidery, ribbons and braid; buttons, hooks and eyes, ornamental novelty pins and needles; artificial flowers; false beards, hair or moustaches; lace trimmings; wigs; clothing fasteners, namely clothing hooks or clasps; hair ornaments.”

34. On information and belief; Opposer does not use mark VENUM AND DESIGN on each and every product and/or service for it registered the asserted mark, and is accordingly estopped from asserting Registration No. 3896673. For example, and without limitation, Applicant's investigation did not uncover user of the mark VENUM AND DESIGN on bed linen, household linen, table linen, ribbons and braids, ornamental novelty pins and needles, artificial flowers, false beards, hairs or moustaches, lace trimmings, wigs, clothing hooks or clasps, and hair ornaments. Accordingly, this mark was either never used or is now abandoned, and Opposer is estopped from its assertion.

59. In its Class 24 application for registration [...] Opposer declared that it uses its VENUM AND DESIGN mark on "Fabrics, namely fabrics made of cotton, microfiber, polyamide, acrylic; fabrics for textile use; velvet; bed linen; household linen; table linen not of paper; bath linen; except clothing."(emphasis added)

60. In its Class 26 application for registration [...] Opposer declared that it uses its VENUM AND DESIGN mark on "Lace and embroidery, ribbons and braids; buttons; hooks and eyes, ornamental novelty pins and needles; artificial flowers; false beards, hair or moustaches; lace trimmings; wigs; clothing fasteners, namely clothing hooks or clasps; hair ornaments." FAA at 60. Furthermore, VENM has pleaded that it was unable to locate any uses by DB of the different goods

Applicant goes on to plead that it has not discovered any evidence of use in these classes

by Opposer in the United States. To wit:

62. Opposer's current website, [www.venumfight.com](http://www.venumfight.com) displays and lists for sale various clothing, bags and gear utilizing the VENUM AND DESIGN mark, but does not display any of the fabrics listed in its Class 24 application listing of goods. The "clothing" offered for sale on this website was specifically excepted from the Class 24 registration, so Opposer is unable to claim that such website constitutes either or technical use of its VENUM AND DESIGN mark on its listing of goods in Class 24.

63. The website [www.venumfight.com](http://www.venumfight.com) also does not display or offer for sale any of the goods listed in its Class 26 application. Opposer cannot claim that its website constitutes technical use of its VENUM AND DESIGN mark on its listing of goods in Class 26.

64. Inasmuch as its own website does not offer for sale any of the listed goods in Classes 24 and 26, Opposer cannot claim that it has used its VENUM AND DESIGN mark on any of its goods listed in Classes 24 and 26.

75. The non-use of the mark for the goods for which it was registered is not justifiable. Accordingly, this mark was never used on all of the goods for which it was registered and Reg. No. 3896673 should be cancelled. [...]

Turning to Reg. No. 3,927,787, Applicant has pleaded as follows:

68. In its Class 25 application for registration [...], Opposer declared that it uses its VENUM AND DESIGN mark on “Martial arts and boxing clothes, namely martial arts uniforms, shorts, kimonos; Sport shoes, especially for the practice of martial arts.”

70. Opposer’s current website, [www.venumfight.com](http://www.venumfight.com) displays and lists for sale various clothing, bags and gear utilizing the VENUM AND DESIGN mark, but does not display any kimonos or sport shoes, especially for the practice of martial arts. Accordingly, Opposer is unable to claim that its website constitutes either actual or technical use, of its VENUM AND DESIGN mark on fabrics.

71. Opposer’s website does display and offer for sale “sandals”, but such sandals are traditional beach shoes in the nature of “flip-flops.” A screen print from the website [www.kungfudirect.com](http://www.kungfudirect.com) shows shoes that are used for martial arts are full fitting shoes or over the foot slippers. [...]

72. Inasmuch as its own website does not display and offer for sale any kimonos or sport shoes for use in martial arts in Class 25, Opposer cannot claim that it has used its VENUM AND DESIGN mark on these two specific goods.

Accordingly, Applicant has pleaded that its investigation has not uncovered any use by OPPOSER of its “VENUM AND DESIGN” mark on kimonos and sport shoes, especially for the practice of martial arts, which is more than sufficient to allege that Opposer has never used its mark within the United States. Although not specifically pleaded, one can easily infer that Opposer also lacked the requisite bona fide intent to use its marks on these creation goods. The lack of bona fide use and a bona fide intent to use can be the basis for cancellation of a registration which claimed foreign priority. See, *Honda Motor Co. Ltd. v Freiderich Winkelmann*, Opposition No. 91170552, April 8, 2009.

**c. Applicant has properly pleaded that Opposer has abandoned its mark for the goods to which Reg. No. 3896673 is directed, and that it has abandoned its**

**mark with regards to Reg. No. 3,927,787 for at least kimonos or sport shoes, especially for the practice of martial arts.**

Opposer asserts that Applicant's Third Counterclaim is deficient and does not put it on notice of an abandonment basis for cancellation. To the contrary, Applicant's pleadings are more than sufficient to provide adequate notice to Opposer to sustain a cancellation of Registration. No. 3,896,673 in its entirety and at least a partial cancellation of Registration. No. 3,927,787 for at least kimonos and sport shoes, especially for the practice of martial arts.

A proper pleading of abandonment comprises (1) a listing of goods, (2) that the registrant ceased using the mark on the listed goods, and (3) an inference that registrant does not intend to resume use of the mark. In particular, Applicant has pleaded as follows:

31. Opposer's Registration No. 3896673 is directed to classes 24 and 26.

32. With regards to class 24, Opposer claims to use the mark on "Fabrics, namely, fabrics made of cotton, microfiber, polyamide, acrylic; fabrics for textile use; velvet; bed linen; household linen; table linen not of paper; except clothing.

33. With regards to class 26, Opposer claims to use the mark on "Lace and embroidery, ribbons and braid; buttons, hooks and eyes, ornamental novelty pins and needles; artificial flowers; false beards, hair or moustaches; lace trimmings; wigs; clothing fasteners, namely clothing hooks or clasps; hair ornaments."

34. On information and belief; Opposer does not use mark VENUM AND DESIGN on each and every product and/or service for it registered the asserted mark, and is accordingly estopped from asserting Registration No. 3896673. For example, and without limitation, Applicant's investigation did not uncover user of the mark VENUM AND DESIGN on bed linen, household linen, table linen, ribbons and braids, ornamental novelty pins and needles, artificial flowers, false beards, hairs or moustaches, lace trimmings, wigs, clothing hooks or clasps, and hair ornaments. Accordingly, this mark was either never used or is now abandoned, and Opposer is estopped from its assertion.

59. In its Class 24 application for registration [...] Opposer declared that it uses its VENUM AND DESIGN mark on "Fabrics, namely fabrics made of cotton, microfiber, polyamide, acrylic; fabrics for textile use; velvet;

bed linen; household linen; table linen not of paper; bath linen; except clothing.”(emphasis added)

60. In its Class 26 application for registration [...] Opposer declared that it uses its VENUM AND DESIGN mark on “Lace and embroidery, ribbons and braids; buttons; hooks and eyes, ornamental novelty pins and needles; artificial flowers; false beards, hair or moustaches; lace trimmings; wigs; clothing fasteners, namely clothing hooks or clasps; hair ornaments.” FAA at 60. Furthermore, VENM has pleaded that it was unable to locate any uses by DB of the different goods

62. Opposer’s current website, [www.venumfight.com](http://www.venumfight.com) displays and lists for sale various clothing, bags and gear utilizing the VENUM AND DESIGN mark, but does not display any of the fabrics listed in its Class 24 application listing of goods. The “clothing” offered for sale on this website was specifically excepted from the Class 24 registration, so Opposer is unable to claim that such website constitutes either or technical use of its VENUM AND DESIGN mark on its listing of goods in Class 24.

63. The website [www.venumfight.com](http://www.venumfight.com) also does not display or offer for sale any of the goods listed in its Class 26 application. Opposer cannot claim that its website constitutes technical use of its VENUM AND DESIGN mark on its listing of goods in Class 26.

64. Inasmuch as its own website does not offer for sale any of the listed goods in Classes 24 and 26, Opposer cannot claim that it has used its VENUM AND DESIGN mark on any of its goods listed in Classes 24 and 26.

68. In its Class 25 application for registration [...], Opposer declared that it uses its VENUM AND DESIGN mark on “Martial arts and boxing clothes, namely martial arts uniforms, shorts, kimonos; Sport shoes, especially for the practice of martial arts.”

70. Opposer’s current website, [www.venumfight.com](http://www.venumfight.com) displays and lists for sale various clothing, bags and gear utilizing the VENUM AND DESIGN mark, but does not display any kimonos or sport shoes, especially for the practice of martial arts. Accordingly, Opposer is unable to claim that its website constitutes either actual or technical use, of its VENUM AND DESIGN mark on fabrics.

71. Opposer’s website does display and offer for sale “sandals”, but such sandals are traditional beach shoes in the nature of “flip-flops.” A screen print from the website [www.kungfudirect.com](http://www.kungfudirect.com) shows shoes that are used for martial arts are full fitting shoes or over the foot slippers. [...]

72. Inasmuch as its own website does not display and offer for sale any kimonos or sport shoes for use in martial arts in Class 25, Opposer cannot claim that it has used its VENUM AND DESIGN mark on these two specific goods.

75. The non-use of the mark for the goods for which it was registered is not justifiable. Accordingly, this mark was never used on all of the goods for which it was registered and Reg. No. 3896673 should be cancelled. [...]

79. Five years have gone by since Opposer filed its two applications and no use has been made by Opposer of its VENUM AND DESIGN mark on the aforesaid goods.

80. Accordingly, Opposer has abandoned its trademark rights for its VENUM AND DESIGN mark on these goods. Section 66 does not eliminate the use requirement for a registrant under it. Accordingly, U.S. Trademark Reg. No. 3,896,673 should be canceled in its entirety and U.S. Trademark Reg. No. 3,927,787 should be canceled for kimonos and sport shoes for use in martial arts.

Taken together, these allegations accuse Opposer of abandoning its mark on the recited goods, and invokes the presumption of abandonment from three or more years of non-use. Applicant's Paragraph 79 recites that five years have passed with no use made by Opposer of its VENUM AND DESIGN mark on selected goods. Section 1127(1) defines three years as prima facie evidence of abandonment. Intent not to use or resume use may be easily inferred from such a three year span and certainly more easily from a five year span of non-use.

*Otto International v. Otto Kern GmbH*, TTAB Proc. No. 921046167, cited by Opposer to support its motion to dismiss is entirely distinguishable. In *Otto*, petitioner had set forth in its first amended answer a claim of abandonment in a single paragraph that was essentially limited to "Registrant has abandoned use." *Otto* at 4. Accordingly, with such a sparse set of allegations, the motion to dismiss the claim for abandonment was granted without prejudice. However, all of

the elements of abandonment, including an invocation of the presumption of abandonment following three years of non-use, are present in these pleadings. *See*, Par. 79.<sup>1</sup>

## **V. AMENDED PLEADING**

If the Board should believe that any of the grounds for cancellation raised by Applicant warrants dismissal, Applicant requests that it be allowed to file an amended pleading to address any deficiencies raised by the Board inasmuch as leave to amend is liberally given. Opposer has requested that the counterclaims be dismissed “with prejudice”. Such an action would be unfair to Applicant, especially without having had any discovery.

## **VI. CONCLUSION**

For the foregoing reasons, Applicant requests that Opposer’s motion to dismiss be denied in its entirety. In particular, Applicant has adequately pleaded that Opposer acquired its registrations by fraudulently misrepresenting its intention of asserting the registrations outside of the martial arts space, which is a proper ground for cancellation. In addition, Applicant adequately pleaded grounds for cancellation based on Opposer never using its mark on certain goods for which it obtained registration, or for abandoning those registrations after not using the marks for more than five years in commerce. And if the Board should be of the opinion that any of the grounds for cancellation raised by Applicant merit dismissal, Applicant requests the opportunity to amend its counterclaim to address any deficiencies.

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<sup>1</sup> It merits attention that Opposer has not contested Applicant’s allegations of non-use and abandonment for the specified goods. Given that presenting evidence of use in its motion would be the surest grounds to obtain dismissal of these allegations, this is tantamount to an admission by Opposer that it has not used the mark as required to maintain the challenged registrations.

Respectfully Submitted

VENM, LLC

Date: January 7, 2014

By: /Konrad Sherinian/

Konrad Sherinian

Depeng Bi

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