

ESTTA Tracking number: **ESTTA722369**

Filing date: **01/24/2016**

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

Proceeding	91221542
Party	Plaintiff John Zidian Co., Inc., Zidian Import, Inc.
Correspondence Address	Edward T. Saadi, Esq. EDWARD T. SAADI, LLC 970 Windham CourtSuite 7 Boardman, OH 44512 UNITED STATES EdwardSaadi@aol.com
Submission	Answer to Counterclaim
Filer's Name	Edward T. Saadi, Esq.
Filer's e-mail	EdwardSaadi@aol.com
Signature	/edward saadi/
Date	01/24/2016
Attachments	Reply to Counterclaim.pdf(1263412 bytes)

1 **PRAYER FOR RELIEF**

2 **WHEREFORE**, Zidian prays:

- 3 1. That its trademark registration nos. 4,422,203 not be cancelled;
- 4 2. That its Notice of Opposition to Applicant's application Ser. No. 86/432,930 be
- 5 sustained, and registration of Applicant's application Ser. No. 86/432,930 be
- 6 refused; and
- 7 3. For such other and further relief as the Board deems just and proper.
- 8

9 Respectfully submitted,

10 DATED: January 24, 2016.

EDWARD T. SAADI, LLC

11
12 By: 

13 Edward T. Saadi, Esq.

14 Ohio Bar No. 0075775

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21 *Attorney for Opposer Zidian Import, Inc.*

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2 **CERTIFICATE OF SERVICE**

3 I hereby certify that the foregoing **REPLY TO COUNTERCLAIM and**
4 **AFFIRMATIVE DEFENSES** was deposited in the United States Mail, First Class, postage
5 prepaid and addressed as follows:

6 Leslie J. Lott, Esq.
7 Adam Diamond, Esq.
8 LOTT & FISCHER, PL
9 P.O. Drawer 141098
10 Coral Gables, FL 33114-1098

11 DATED: 1/24/16

12 **EDWARD T. SAADI, LLC**

13 By:



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