

ESTTA Tracking number: **ESTTA752322**

Filing date: **06/14/2016**

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

Proceeding	91227373
Party	Plaintiff Tingyi (Cayman Islands) Holding Corp.
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Date	06/14/2016
Attachments	KANG SHI FU Opposition_ANSWER to Counterclaims.pdf(204696 bytes )

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

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	)	
Tingyi (Cayman Islands) Holding Corp.,	)	
	)	Opposition No. 91227373
Opposer,	)	Serial No. 86/859,139
	)	Mark: KANG SHI FU (& Design)
	)	
v.	)	
	)	
Lin's Waha International Corp,	)	
	)	
Applicant.	)	
	)	
	)	

**OPPOSER’S ANSWER TO COUNTERCLAIMS**

Tingyi (Cayman Islands) Holding Corp., a corporation of the Cayman Islands (hereinafter "Opposer"), by its attorneys hereby responds to the allegations set forth in the Counterclaims filed by Lin's Waha International Corp (hereinafter, "Applicant"), as follows:

1. Opposer admits that the United States Patent and Trademark Office's ("USPTO") TESS database indicates that Applicant is the owner of the trademark registration identified in Paragraph 1 of the Counterclaims.
2. Opposer admits that the United States Patent and Trademark Office's ("USPTO") TESS database indicates that Applicant is the owner of the trademark registration identified in Paragraph 2 of the Counterclaims.
3. Opposer admits that the United States Patent and Trademark Office's ("USPTO") TESS database indicates that Applicant is the owner of the trademark application identified in

Paragraph 3 of the Counterclaims.

4. Opposer admits the allegations set forth in Paragraph 4 of the Counterclaims.
5. Opposer admits the allegations set forth in Paragraph 5 of the Counterclaims.
6. Opposer admits the allegations set forth in Paragraph 6 of the Counterclaims.
7. Opposer admits the allegations set forth in Paragraph 7 of the Counterclaims.
8. Opposer admits the allegations set forth in Paragraph 8 of the Counterclaims.
9. Opposer admits the allegations set forth in Paragraph 9 of the Counterclaims.
10. Opposer admits the allegations set forth in Paragraph 10 of the Counterclaims.
11. Opposer admits the allegations set forth in Paragraph 11 of the Counterclaims.
12. Opposer admits the allegations set forth in Paragraph 12 of the Counterclaims.
13. Opposer denies the allegations set forth in Paragraph 13 of the Counterclaims.
14. Opposer denies the allegations set forth in Paragraph 14 of the Counterclaims.
15. Opposer denies the allegations set forth in Paragraph 15 of the Counterclaims.
16. Opposer denies the allegations set forth in Paragraph 16 of the Counterclaims.
17. Opposer denies the allegations set forth in Paragraph 17 of the Counterclaims.
18. Opposer denies the allegations set forth in Paragraph 18 of the Counterclaims.
19. Opposer denies the allegations set forth in Paragraph 19 of the Counterclaims.
20. Opposer denies the allegations set forth in Paragraph 20 of the Counterclaims.
21. Opposer denies the allegations set forth in Paragraph 21 of the Counterclaims.
22. Opposer denies the allegations set forth in Paragraph 22 of the Counterclaims.
23. Opposer denies the allegations set forth in Paragraph 23 of the Counterclaims.

WHEREFORE, Opposer requests that registration of the mark sought to be registered herein, KANG SHI FU (& Design) of Appl'n. Serial No. 86/859,139 be denied, Applicant's Counterclaims be dismissed, and that this Opposition be sustained.

Respectfully Submitted,

Dated: June 14, 2016

By: /Paulo A. de Almeida/  
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Attorneys for Opposer,  
Tingyi (Cayman Islands) Holding Corp.

**PROOF OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **OPPOSER'S ANSWER TO COUNTERCLAIMS** has been served on Eric J Shimanoff, the counsel of record for Serial No. 86/859,139 as listed in the USPTO database, on June 14, 2016, via First Class U.S. Mail, postage prepaid to:

Eric J Shimanoff  
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/Paulo A. de Almeida/

Paulo A. de Almeida