

ESTTA Tracking number: **ESTTA3926**

Filing date: **12/17/2003**

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

<b>Proceeding</b>	92032585
<b>Party</b>	Defendant TANEL ACQUISITION GROUP, INC.
<b>Correspondence Address</b>	MICHAEL T. HOPKINS IP SPECIAL COUNSEL, LTD 1363 N. PROSPECT AVENUE MILWAUKEE, WI 53202
<b>Submission</b>	Answer
<b>Filer's Name</b>	Michael T. Hopkins
<b>Filer's e-mail</b>	mhopkins@ipspecialcounsel.com
<b>Signature</b>	/ Michael T. Hopkins/
<b>Date</b>	12/17/2003
<b>Attachments</b>	Answer to Petition.pdf ( 2 pages ) TTAB 12-17-03.ltr.pdf ( 1 page )



3. In answer to paragraph 3, Registrant denies that Tanel Acquisition Group is the current owner of the “360°” mark referenced therein, and affirmatively alleges that the current owner of said mark is Tanel Corporation.

4. In answer to paragraph 4, Registrant denies that Petitioner is entitled to cancellation of said mark, as alleged therein or otherwise.

5. In answer to paragraph 5, Respondent denies that it, or its predecessor in interest has ever abandoned the mark “360°,” as alleged therein or otherwise..

6. In answer to paragraph 6, Registrant denies that Petitioner has any right to use the mark “360°” or any variation thereof which is likely to cause confusion in the marketplace, including, but not limited to the mark “HP 360°,” and hence denies that the continuation of Registrant’s registration for the mark “360°” will or has caused injury to Petitioner, as Registrant first used said mark in commerce on May 6, 1986, said mark has been in continual use since that date in the sale and marketing of shoes, and Registrant’s interest in said mark is superior to Petitioner’s and incontestable.

7. In answer to paragraph 7, Registrant denies the allegations contained therein.

s/ Michael T. Hopkins

Attorney Michael T. Hopkins  
Counsel for Registrant, Tanel Corporation

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December 17, 2003

Trademark Trial and Appeal Board  
Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, VA 22202-3514

In re: Proceeding No: 92032585  
Mark: 360°  
Registrant: Tanel Corporation  
Registration No: 1484334  
Registration Date: April 12, 1988  
Petitioner: Wolverine World Wide, Inc.

Dear Commissioner:

Enclosed for filing please find the Answer of Registrant to Petition for Cancellation. The Decision vacating the prior order was mailed to the undersigned in an envelope from the TTAB bearing a post mark of November 18, 2003. Consequently, I believe this Answer is timely. I have retained the TTAB's original envelope in the event Petitioner desires a copy of same.

Thank you for your assistance.

Yours very truly,

s/  
Michael T. Hopkins

Enc.  
CC: Attorney James L. Scott (via e-mail)

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