



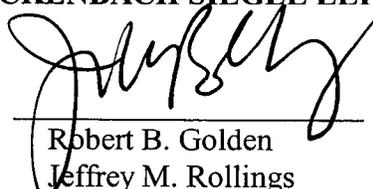
based upon a foreign registration under section 44(e), but Applicant otherwise denies the allegations of Paragraph 6.

**AFFIRMATIVE DEFENSES**

1. Petitioner's claims are barred by the doctrines of laches, acquiescence, estoppel, and/or waiver.
2. Registrant's mark SANTA EDWIGES & Design is not confusingly similar to Petitioner's mark PAN SANTA EDUVIGIS.
3. There is no likelihood of confusion.

Dated: Scarsdale, New York  
November 16, 2004

**LACKENBACH SIEGEL LLP**

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the enclosed ANSWER TO PETITION FOR CANCELLATION was served on counsel for Petitioner on November 16, 2004, by First Class Mail, addressed to counsel for Petitioner as follows:

Cristina A. Carvalho, Esq.  
Arent Fox PLLC  
1050 Connecticut Avenue, NW  
Washington, D.C. 20036

  
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Jeffrey M. Rollings