

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

Certificate of Mailing

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[Signature]

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 ERNESTINA CASTRO, S.A. de C.V., :
 :
 Petitioner, :
 :
 v. :
 :
 DOCEIRA CAMPOS DO JORDÃO :
 LTDA., :
 :
 Registrant. :
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Cancellation No. 92043753
 Registration No. 2781559

ANSWER TO AMENDED PETITION FOR CANCELLATION

Doceira Campos Do Jordão Ltda. ("Registrant"), for its answer and defenses to the Petition for Cancellation filed by Ernestina Castro, S.A. de C.V. ("Petitioner"), states as follows:

1. Registrant is without information or knowledge sufficient to form a belief as to the truth of the allegations of Paragraphs 1, 3, 4, 5, 6, 10, and 13 of the Petition for Cancellation, and therefore denies same.
2. Registrant denies the allegations of Paragraphs 2, 9, 11, 12, 14, 15, and 16 of the Petition for Cancellation.
3. Registrant is without information or knowledge sufficient to form a belief as to the truth of Petitioner's assertion of "prior rights," in Paragraph 7 of the Petition for Cancellation, and therefore denies such allegation, but otherwise admits the remaining allegations of Paragraph 5.
4. Registrant admits, with respect to Paragraph 8 of the Petition for Cancellation, that Registrant initially filed U.S. Trademark Application Serial No. 76457276 as an "intent-to-use" application under section 1(b), and subsequently converted the application to be



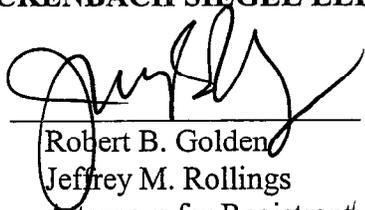
based upon a foreign registration under section 44(e), but Registrant otherwise denies the allegations of Paragraph 6.

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
April 11, 2005

LACKENBACH SIEGEL LLP

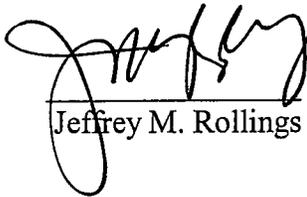
By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the enclosed ANSWER TO AMENDED PETITION FOR CANCELLATION was served on counsel for Petitioner on April 11, 2005, by First Class Mail, addressed to counsel for Petitioner as follows:

Chiara Guiliani, Esq.
Arent Fox PLLC
1050 Connecticut Avenue, NW
Washington, D.C. 20036



Jeffrey M. Rollings