

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

Morris Publishing Group, LLC
 Petitioner,
 v.
 Southern California Public Radio
 Registrant

)
) Cancellation No. 92051186
)
) Mark: PACIFIC DRIFT
)
) Reg. No.: 3,054,173
)

78/536,454

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this Transmittal Letter and the paper, as described herein, are being deposited in the United States Postal Service, as first class mail, in an envelope addressed to: Trademark Trial and Appeal Board, U.S. Patent and Trademark Office, P.O. Box 1451, Alexandria, VA 22313-1451, on October 14, 2009.

By: Lisa A. Joyce
 Name: Lisa A. Joyce

Trademark Trial and Appeal Board
 U.S. Patent and Trademark Office
 P.O. Box 1451
 Alexandria, VA 22313-1451

Dear Commissioner:

We are transmitting herewith the attached:

- Return postcard.
 Transmittal Sheet containing Certificate Under 37 C.F.R. 1.8
 Answer to Cancellation Petition

Please charge any additional fees or credit overpayment to Deposit Account No. 50-0996 (SCPR.101TA).

CRAWFORD MAUNU PLLC
 1150 Northland Drive, Suite 100
 St. Paul, MN 55120
 (651) 259-2302

By: Linda M. Byrne
 Name: Linda M. Byrne
 Reg. No. 32,404



10-19-2009

SCPR.101TA

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

MORRIS PUBLISHING GROUP, LLC)

Petitioner,)

v.)

SOUTHERN CALIFORNIA PUBLIC RADIO)

Registrant)

Cancellation No. 92051186

Mark: PACIFIC DRIFT

Reg. No.: 3,054,173

U.S. Patent and Trademark Office
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER TO CANCELLATION PETITION

Southern California Public Radio, the Registrant-Defendant herein, through its attorneys, hereby answers the Petition for Cancellation as set forth below.

As a general response to the Petition for Cancellation, Defendant denies that Petitioner will be damaged by the registration of the Registrant-Defendant's mark PACIFIC DRIFT in International Class 41. Defendant also denies that the Petitioner has any proper standing to bring this Petition for Cancellation. In addition, the Registrant-Defendant submits that the Petitioner has not set forth any valid reasons as to why the Registrant is not entitled under law and fact to maintain its registration for PACIFIC DRIFT.

The below paragraph numbers correspond to those used in the Petition for Cancellation:

1. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 1 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

2. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 2 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

3. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 3 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

4. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 4 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

5. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 5 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

6. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 6 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

7. Defendant does not presently possess sufficient information to agree or disagree with the statement made in Paragraph No. 7 in the Petition for Cancellation, and accordingly the same is denied with Petitioner being left to its proofs.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

WHEREFORE, Registrant-Defendant requests that the above cancellation proceeding be dismissed and that the registration for PACIFIC DRIFT in International Class 41 be maintained; and for such other and further relief as may be deemed just and proper by the Trademark Trial and Appeal Board.

Respectfully submitted,

SOUTHERN CALIFORNIA PUBLIC RADIO

By Its Attorneys

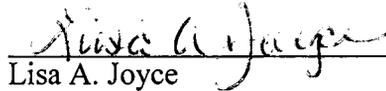
Date: October 19, 2007



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Attorneys for Registrant

CERTIFICATE OF MAILING

I hereby certify that this ANSWER TO CANCELLATION PETITION is being deposited with the United States Postal Service, first class mail, in an envelope addressed to Trademark Trial and Appeal Board, U.S. Patent and Trademark Office, P.O. Box 1451, Alexandria, VA 22313-1451 on this 14th day of October, 2009.



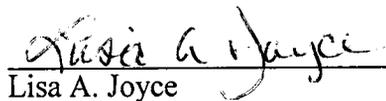
Lisa A. Joyce

CERTIFICATE OF SERVICE

I hereby certify that this ANSWER TO CANCELLATION PETITION is being deposited with the United States Postal Service, postage prepaid, in an envelope addressed to:

Mr. Timothy E. Moses
Hull, Towill, Norman, Barrett & Salley, P.C.
801 Broad Street, Suite 700
Augusta, GA 30901

on this 14th day of October, 2009.



Lisa A. Joyce