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

Proceeding	92051334
Party	Defendant RADEUM, INC.
Correspondence Address	RADEUM, INC. 266 W. CENTER STREET OREM, UT 84057 UNITED STATES
Submission	Answer
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Date	09/21/2009
Attachments	0106-0012TrademarkAnswer.pdf (3 pages)(108532 bytes)

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

In the matter of Trademark Registration No. 2,815,366
For the mark: LIBERTYLINK
Date registered: February 17, 2004

THALES COMMUNICATIONS, INC., Petitioner, v. RADEUM, INC., Respondent and Registrant.	Cancellation No. 92051334

ANSWER TO THE PETITION FOR CANCELLATION

Respondent Radeum, Inc. ("Registrant") by and through its attorneys Jefferson IP Law, LLP, answers the Petition for Cancellation filed by Thales Communications, Inc. ("Petitioner") as follows:

1. In response to the first unnumbered paragraph of the Petition for Cancellation, Registrant is without sufficient knowledge or information sufficient to form a belief as to the truth of the allegations contained in this—and on that basis denies each and every allegation contained in this paragraph leaving Petitioner to its proof.
2. In response to Paragraph 1 of the Petition for Cancellation, Registrant is without sufficient knowledge or information sufficient to form a belief as to the truth of the allegations contained in this - and on that basis denies each and every allegation contained in this paragraph leaving Petitioner to its proof.
3. In response to Paragraph 2 of the Petition for Cancellation, Registrant Admits all allegations contained therein.
4. In response to the first Paragraph 3 of the Petition for Cancellation, Registrant is without sufficient knowledge or information sufficient to form a belief as to the truth of the allegations contained in this - and on that basis denies each and every allegation contained in this paragraph leaving Petitioner to its proof.
5. To the extent that the allegations contained in the second Paragraph 3 of the Petition for Cancellation constitute legal conclusions, an answer is not required, and on that basis Registrant denies each and every allegation contained therein. To the extent that the allegations contained in the

second Paragraph 3 of the Petition for Cancellation are factual allegations, Registrant denies all allegations contained therein.

6. To the extent that the allegations contained in Paragraph 4 of the Petition for Cancellation constitute legal conclusions, an answer is not required, and on that basis Registrant denies each and every allegation contained therein. To the extent that the allegations contained in Paragraph 4 of the Petition for Cancellation are factual allegations, Registrant denies all allegations contained therein.
7. In response to Paragraph 5 of the Petition for Cancellation, Registrant is without sufficient knowledge or information sufficient to form a belief as to the truth of the allegations contained in this - and on that basis denies each and every allegation contained in this paragraph leaving Petitioner to its proof.

AND AS FOR AN AFFIRMATIVE DEFENSE

In further response to the Petition for Cancellation, and without assuming the burden of proof on any matter that should rest with the Petitioner, Registrant asserts the following defense:

8. Registrant and its predecessors in interest have never discontinued use of the mark with intent not to resume use within at least the last three years.
9. As Registrant lacks sufficient knowledge or information sufficient to form a belief as to whether it may have additional separate or affirmative defenses not stated in this Answer to the Petition for Cancelation, Registrant reserves the right to assert additional separate or affirmative defenses based on further discovery, investigation, or analysis.

WHEREFORE, the Petition for Cancellation should be dismissed with prejudice.

Respectfully submitted,

JEFFERSON IP LAW, LLP

Date: September 21, 2009

By: Raymond B. Persino
Raymond B. Persino
Attorney for Registrant

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing ANSWER TO THE PETITION FOR CANCELLATION has been mailed on September 21, 2009 by first class mail, postage prepaid, in an envelope addressed to Petitioner's counsel as follows:

Anthony V. Lupo
Arent Fox LLP
1050 Connecticut Avenue, NW
Washington, DC 20036

Raymond B. Persino