

ESTTA Tracking number: **ESTTA345020**

Filing date: **04/30/2010**

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

Proceeding	92052225
Party	Defendant Lions Den Scottsdale, LLC
Correspondence Address	LIONS DEN SCOTTSDALE, LLC 2954 NORTH HAYDEN ROAD SCOTTSDALE, AZ 85251 UNITED STATES
Submission	Answer
Filer's Name	Kevin M. Gold, Esquire
Filer's e-mail	kgold@rhoads-sinon.com
Signature	/kmg/
Date	04/30/2010
Attachments	Answer to Petition for Cancellation.PDF (3 pages)(70819 bytes)

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

In the matter of Registration No.: 3742454)	
Date of Issuance: January 26, 2010)	
Trademark LION'S DEN MMA ACADEMY)	
_____)	
Ken Shamrock, Inc.)	
)	Cancellation No. 92052225
Petitioner,)	
)	
v.)	
)	
Lions Den Scottsdale LLC)	
)	
Registrant.)	
_____)	

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Registrant, Lions Den Scottsdale, LLC, by and through its undersigned counsel, hereby responds to the Petition for Cancellation as follows:

1. Registrant denies the allegations in paragraph 1 to the extent they allege that the Petitioner has consistently and continuously used the Lion's Den mark and that Petitioner has any valid ownership in and/or to the Lion's Den mark at this time.
2. Registrant denies the allegations in paragraph 2 as stated. By way of further response, only the pending application at serial No. 77944275 is owned by Petitioner. The other cited trademarks, which are all either abandoned or cancelled and only two of which ever became registered trademarks, are not in the Petitioner's name as owner of record.
3. Registrant denies the allegations of infringement in paragraph 3 but admits that Registrant was previously an authorized licensee of the Lion's Den name and that Registrant's Member, Scott Peters, either has, or had, an equity interest in Petitioner's business involving the Lion's Den mark.

AFFIRMATIVE DEFENSES

1. Petitioner has not and will not be damaged by the registration of the trademark LIONS DEN MMA ACADEMY® and therefore lacks standing to petition to cancel the registration.
2. Petitioner is barred from seeking cancellation of the Registrant's trademark under the doctrines of laches, estoppel, waiver and/or unclean hands.
3. Petitioner has acquiesced in Registrant's adoption, registration and use of the mark that is the subject of the petition for cancellation.
4. Petitioner's rights in and to the Registrant's trademark, if any, have been abandoned.

WHEREFORE, Registrant prays that the Cancellation be dismissed with prejudice.

Respectfully submitted,

RHOADS & SINON LLP

By: _____


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Date: 4/30/2010

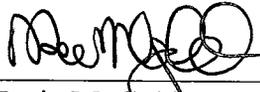
Attorneys for Registrant

Cancellation No. 92052225

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Registrant's Answer to Petition for Cancellation was served on counsel for petitioner, this 30th day of April, 2010, by sending the same via email and FedEx to:

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