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

Proceeding	92054551
Party	Plaintiff Andrey Pinsky
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Date	03/21/2012
Attachments	2012-03-20 (Reply to Registrant's Reply).pdf (3 pages)(14919 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

ANDREY PINSKY,

Petitioner,

v.

DOUGLAS BURDA

Registrant.

Cancellation No. 92054551

**PETITIONER'S REPLY TO REGISTRANT'S REPLY TO PETITIONER'S
OPPOSITION TO REGISTRANT'S MOTION FOR DEFAULT JUDGMENT**

1. Petitioner brings to the attention of the Trademark Trial and Appeal Board ("TTAB") that Registrant in his Reply to Petitioner's Opposition to Registrant's Motion for Default Judgement (ESTTA entry #35) failed to refute, and failed to provide any evidence that might have been able to refute, any of the numerous instances of fraudulent submissions Registrant made to the United States Patent and Trademark Office ("USPTO") applying in his own name for the trademarks PANDA and TRADEMARK PANDA. These numerous instances of fraudulent submissions were properly documented and presented by Petitioner in his Opposition to Registrant's Motion for Default Judgement (ESTTA entry # 34).
2. Petitioner brings to the attention of the TTAB that Registrant in his Reply to Petitioner's Opposition to Registrant's Motion for Default Judgement (ESTTA entry #35) also failed to refute, and failed to provide any evidence that might have been able to refute, any of the numerous instances of false submissions Registrant deliberately and wilfully made to the TTAB in his Motion for Default Judgement (ESTTA entry #27). These numerous instances

were also properly documented and presented by Petitioner in his Opposition to Registrant's Motion for Default Judgement (ESTTA entry # 34).

3. Notably, and most importantly, Registrant did not deny the fact that he lied about not being properly served by Petitioner with Petitioner's initial disclosures.
4. Registrant, instead of refuting evidence of the numerous fraudulent and false submissions made by Registrant to both the USPTO and TTAB, stated in his Reply to Petitioner's Opposition to Registrant's Motion for Default Judgement (ESTTA entry #35) that because instances of fraudulent and false submissions are so numerous, he would not respond to evidence presented by Petitioner.

March 20, 2012

A handwritten signature in cursive script that reads "Andrey Pinsky". The signature is written in black ink and is positioned above the printed name.

Andrey Pinsky

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that a true and complete copy of the foregoing PETITIONER'S REPLY is being electronically transmitted to the Trademark Trial and Appeal Board, U.S. Patent and Trademark Office on March 21, 2012.

By:



Andrey Pinsky

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S REPLY has been served on Douglas Burda by sending a copy via FedEx on March 20, 2012 to:

DOUGLAS BURDA
KONCEPT INNOVATIVE LAW
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900 LAS VEGAS BOULEVARD SOUTH
LAS VEGAS, NEVADA, 89101
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By:



Andrey Pinsky