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

Proceeding	92055259
Party	Defendant Conagra Grocery Products Company, LLC
Correspondence Address	CONAGRA GROCERY PRODUCTS COMPANY LLC ONE CONAGRA DRIVE OMAHA, NE 68102 UNITED STATES
Submission	Answer
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Date	04/10/2012
Attachments	SCREAMING ZEBRA ZONKERS ANSWER.pdf (4 pages)(209505 bytes)

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

STRATEGIC MARKS, LLC)	
)	
Petitioner,)	CANCELLATION NO. 92055259
)	
v.)	REG. NO.: 3,135,751
)	
CONAGRA GROCERY PRODUCTS)	MARK: SCREAMING ZEBRA
COMPANY, LLC)	ZONKERS
)	
Registrant.)	
)	

REGISTRANT'S ANSWER TO PETITION TO CANCEL

Box TTAB
Commission for Trademarks
P.O. Box 1451
Arlington, VA 22313-1451

ConAgra Grocery Products Company, LLC ("Registrant"), a Delaware corporation doing business at One ConAgra Drive, Omaha, NE 68102, in answer to the Cancellation of the Petitioner, Strategic Marks, LLC ("Petitioner"), states as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 1 of the Petition to Cancel and accordingly, denies the same.
2. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 2 of the Petition to Cancel and accordingly, denies the same.
3. Registrant admits the allegations of Paragraph 3.
4. Registrant admits the allegations of Paragraph 4.

5. Registrant admits that Exhibit C is a copy of the Examiner's July 26, 2011 Notice of Suspension relating to an application for the mark SCREAMING ZEBRA ZONKERS, however Registrant is without knowledge or information sufficient to form a belief as to the remaining allegations set forth in paragraph 5 of the Petition to Cancel and accordingly, denies the same.

6. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 6 of the Petition to Cancel and accordingly, denies the same.

COUNT I
LIKELIHOOD OF CONFUSION

7. All prior responses are incorporated herein by reference.
8. Registrant denies the allegations of Paragraph 8.
9. Registrant denies the allegations of Paragraph 9.
10. Registrant denies the allegations of Paragraph 10.

WHEREFORE, Registrant prays that:

- A. The Board refuses to sustain the Cancellation of the Petitioner;
- B. The Board finds that there is no basis in fact to support the Cancellation of the Petitioner;
- C. The Board dismiss this Cancellation; and
- D. The Board grant such other and further relief as may be appropriate.

Dated this 10th day of April, 2012.

CONAGRA GROCERY PRODUCTS COMPANY,
LLC

By /s/ Christopher M. Bikus
Christopher M. Bikus
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ATTORNEYS FOR REGISTRANT

CERTIFICATION UNDER 37 C.F.R. § 1.8

I hereby certify that REGISTRANT'S ANSWER TO PETITION TO CANCEL is being filed electronically with the United States Patent and Trademark Office utilizing the *Electronic System for Trademark Trials and Appeals* this 10th day of April, 2012.

/s/ Christopher M. Bikus
Christopher M. Bikus

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing REGISTRANT'S ANSWER TO PETITION TO CANCEL was mailed first class, postage prepaid on this 10th day of April, 2012 to the following:

Chris Ditico, Esq.
Raj Abhyanker, P.C.
1580 W. El Camino Real, Suite 8
Mountain View, CA 94040

/s/ Christopher M. Bikus
Christopher M. Bikus