

ESTTA Tracking number: **ESTTA476082**

Filing date: **06/04/2012**

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

Proceeding	92055588
Party	Defendant Orlando A. Herrera, Constance Goldmeer and The World Peace Program, LLC
Correspondence Address	ORLANDO A HERRERA 2751 S OCEAN DRIVE , SUITE 805-S HOLLYWOOD, FL 33019 UNITED STATES TheWorldPeaceProgram@gmail.com
Submission	Answer
Filer's Name	Orlando A. Herrera
Filer's e-mail	TheWorldPeaceProgram@gmail.com
Signature	/Orlando Herrera/
Date	06/04/2012
Attachments	Cancellation # 92055588 -Answer to Petition to Cancel.pdf (2 pages)(82969 bytes)

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

Federation Internationale de Football)	
Association (FIFA).)	
Petitioner,)	Cancellation No. 92055588
v.)	Registration No. 4127208
Orlando A. Herrera, Constance Goldmeer, and)	
The World Peace Program, LLC)	
Registrants.)	

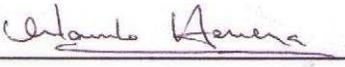
ANSWER TO PETITION TO CANCEL

Registrants admit averments No. 1 and 2. However, Registrants deny averments 3, 4, 5, 6,7,8,9, and 10.

Allegations on averments 3 through 9 are merely Petitioner’s suppositions and are unsupported by factual averments since registrants met the requirements of section 1(a) of the Trademark Act, 15 U.S.C. & 21051(a) as well as the requirements of section 23(a) of the Trademark Act, 15 U.S.C. & 1091(a) as proven by having obtained a registration on the Supplemental Register from the United States Patent and Trademark Office. Otherwise, registration No. 4127208 would not have been granted to Registrants.

Allegations in averment 10 in support of petitioner’s belief of damage don’t have a reasonable basis and are only subjective beliefs. Therefore, since petitioner has not proven his case, registrants respectfully requests and files concurrently with this answer a motion to Dismiss for Failure of petitioner to State a claim upon which relief can be granted.

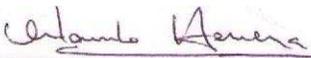
Respectfully submitted,
The World Peace Program, LLC

By: 
Orlando A. Herrera, Defendant
Principal and Partner

Orlando A. Herrera
2751 S. Ocean Drive, Suite 805-S
Hollywood, FL 33019

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing "ANSWER TO PETITION TO CANCEL" has been served on Petitioner's Attorneys, Holley & Menker, PA, at the address of P.O. Box 331537, Atlantic Beach, FL 32233, via first class mail, today **June 1, 2012.**

By: 

Orlando A. Herrera