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

Proceeding	92055812
Party	Defendant Susoix LLC
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Date	04/03/2013
Attachments	Answer to Conservancy's Petition to Cancel Skateboarder Mark.pdf (6 pages) (15041 bytes)

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

Central Park Conservancy, Inc.

Petitioner,

v.

Cancellation No. 92055812

Susoix LLC,

Registrant.

**Susoix’s Answer to Central Park
Conservancy’s Petition For Cancellation**

Pursuant to Federal Rules of Civil Procedure, Susoix, LLC (“Registrant”), by and through its undersigned counsel, submits the following Answer to the claims and allegations in the July 6, 2012 Notice of Opposition filed by the Central Park Conservancy, Inc. (“Petitioner”).

1. Registrant admits to the first sentence. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the first clause of the second sentence and on this basis denies the allegation. Registrant admits that the initial registration date for Reg. No. 2261972 is July 20, 1999, but denies the remainder of the second clause of the second sentence. Registrant admits the third sentence.
2. Registrant admits.
3. Registrant admits that some registrations were attached, but avers that a number of the marks are not registered and hence no registrations were attached for those marks.
4. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the sentence, and on this basis denies the allegation.

5. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the first sentence, and on this basis denies the allegation. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the second sentence, and on this basis denies the allegation.
6. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the sentence, and on this basis denied the allegation.
7. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the contract between Central Park and the New York City Department of Parks and Recreation, and on this basis denies the first sentence. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the second sentence, and on this basis denies the allegation.
8. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the first sentence, and on this basis denied the allegation. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the second sentence, and on this basis denied the allegation.
9. Registrant lacks knowledge or information sufficient to form a belief about the truth or falsity of the sentence, and on this basis denies the allegation. The allegation also constitutes conclusions of law to which no response is required.
10. Registrant admits that “Central Park Entire: The Definitive Illustrated Poster” includes a map of Central Park that accurately locates and identifies the species of over 19,600 trees in the Park and shows all paved paths and woodland trails, all water bodies, all major rock formations as well as depictions of all the Park's architectural features, and comes with a separate, full-color Tree Legend to help identify the more

than 170 individual tree species found on the map. Registrants deny the remaining allegations in the first sentence.

11. Registrant admits the allegations in the first sentence.
12. The allegations purport to characterize the mark itself and quote from the official application for the mark. The mark and application speak for themselves and are the best evidence of their contents. The Board is referred to the mark itself and the official application for a true and complete portrayal of its components.
13. Registrant denies.

FIRST GROUND FOR OPPOSITION

14. The allegations constitute legal conclusions to which no response is required. To the extent a response is required, Registrant denies any violation of the Lanham Act.
15. Registrant denies the allegation.
16. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
17. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
18. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
19. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
20. Registrant denies the allegation.
21. Registrant denies the allegation.
22. Registrant denies the allegation.

SECOND GROUND FOR OPPOSITION

23. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required. To the extent a response is required, Registrant denies any violation of the Lanham Act.
24. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
25. The allegations in the first, second, and third sentences constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required. To the extent a response is required, Registrant denied any violation of the Lanham Act.
26. Registrant denies the allegation.

THIRD GROUND FOR OPPOSITION

27. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
28. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required. To the extent a response is required, Registrant denies any violation of the Lanham Act.
29. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
30. The allegations constitute legal conclusions and Petitioner's characterizations of the case, to which no response is required.
31. The allegations constitute Petitioner's prayer for relief, to which no response is required. To the extent a response is required, Registrant denies that Petitioners are entitled to the relief requested or any relief whatsoever.

32. Registrant lacks information or knowledge sufficient to form a belief about the allegation, and on this grounds denies it.

PETITIONER'S PRAYER FOR RELIEF

The remaining allegations constitute Petitioner's prayer for relief, to which no response is required. To the extent a response is required, Registrant denies that Petitioner is entitled to the relief requested or any relief whatsoever.

GENERAL DENIAL

Registrant denies any and all allegations in Petitioner's Notice of Opposition, whether express or implied, that are not specifically admitted, denied, or qualified herein.

Dated: April 3, 2013

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and complete copy of the foregoing document has been served on the Conservancy by electronic transmission mutually agreed upon by the parties to:

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