

ESTTA Tracking number: **ESTTA576567**

Filing date: **12/13/2013**

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

Proceeding	92057717
Party	Defendant Ambrea C. Hanson
Correspondence Address	AMBREA C HANSON 419 EIGHTH AVENUE NEW GLARUS, WI 53574 UNITED STATES ambreahanson@me.com
Submission	Answer
Filer's Name	Ambrea C. Hanson
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Signature	/Ambrea C Hanson/
Date	12/13/2013
Attachments	USPT Reply to 92057717.pdf(433902 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Samuel Katzin-Simon,

Petitioner,

v.

Ambrea C. Hanson,

Registrant.

Cancellation No. 92057717

ANSWER TO PETITION FOR CANCELLATION

Ambrea C. Hanson, ("Registrant"), hereby submits this Answer to the Petition for Cancellation filed by Samuel Katzin-Simon, ("Petitioner"). Unless expressly admitted herein, each allegation contained in the Petition for Cancellation is denied.

1. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 1 of the Petition.
2. Registrant admits the allegations in Paragraph 2 of the Petition.
3. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 3 of the Petition.
4. Registrant Denies the allegations in Paragraph 4 of the Petition for Cancellation.

5. Paragraph 5 of the Petition for Cancellation states a legal conclusion. To the extent it is construed as an allegation of fact, Registrant lacks knowledge or information to form a belief as to the truth of the allegation.

AFFIRMATIVE DEFENSES

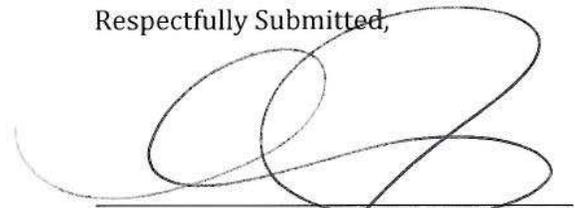
6. Registrant repeats and realleges its Answer in Paragraphs 1 through 5 as though full set forth herein.
7. The Petition for Cancellation is based on the false allegation that Registrant's registration is abandoned and discontinued with intent not to resume such use.
8. Registrant has used its mark CHIEKI in commerce and plans to continue to use the mark.

PRAYER FOR RELIEF

WHEREFORE, Registrant respectfully prays that the Trademark Trial and Appeal Board deny the Petition for Cancellation, with prejudice.

Date: December 13, 2013  
New Glarus, Wisconsin

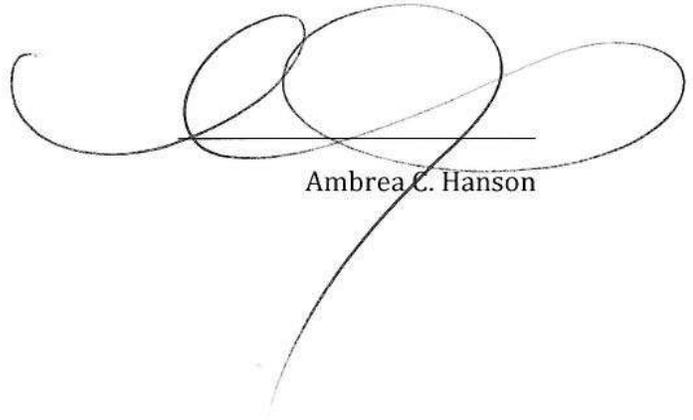
Respectfully Submitted,



Ambrea C. Hanson  
Registrant Owner for U.S. Registration No. 3,738,107  
419 Eighth Ave  
New Glarus, Wisconsin 53574  
USA  
608-636-0166  
[ambreahanson@me.com](mailto:ambreahanson@me.com)

CERTIFICATE OF SERVICE

I hereby certify that this foregoing Answer to Petition for Cancellation is being deposited with the United States Postal Service with sufficient postage as first class mail on December 13, 2013 addressed to Samuel Katzin-Simon (Petitioner), 200 Park Ave South, #25697, New York, NY 10003, and Susan Upton Douglass (Attorney for Petitioner), Fross Zelnick Lehrman & Zissu, P.C., 866 United Nations Plaza, New York, NY 10017.



Ambrea C. Hanson