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

Proceeding	92057980
Party	Defendant Zitro IP S.AR.L.
Correspondence Address	CHARLES W FALLOW SHOEMAKER & MATTARE 10 POST OFFICE ROAD, SUITE 100 SILVER SPRING, MD 20910 UNITED STATES cfallow@shomat.com
Submission	Answer
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Date	10/08/2014
Attachments	Answer2Cancellation.pdf(45695 bytes)

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

Boyd Gaming Corporation,	:	
Petitioner	:	Cancellation No. 92057980
v.	:	Registration No. 3812473
Zitro IP, S.ar.l.,	:	Trademark: POWERMANIA BINGO
Registrant	:	

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Registrant Zitro IP, S.ar.l. responds to the Petition for Cancellation filed by Petitioner Boyd Gaming Corporation as follows:

1. Registrant admits the averments in paragraph 1 of the Petition.
2. Registrant admits the averment in paragraph 2 of the Petition.
3. Registrant admits the averment in paragraph 3 of the Petition.
4. Registrant admits the averment in paragraph 4 of the Petition.
5. Registrant admits the averment in paragraph 5 of the Petition.
6. Registrant admits the averment in paragraph 6 of the Petition.
7. Registrant admits the averment in paragraph 7 of the Petition.
8. Registrant admits the averment in paragraph 8 of the Petition.
9. Registrant denies the allegation in paragraph 9 of the Petition.

10. Registrant is without information sufficient to answer the allegation in paragraph 10 of the Petition and therefore denies the same.

11. Registrant is without information sufficient to answer the allegation in paragraph 11 of the Petition and therefore denies the same.

12. Registrant is without information sufficient to answer the allegation in paragraph 12 of the Petition and therefore denies the same.

13. Registrant is without information sufficient to answer the allegations in paragraph 13 of the Petition and therefore denies the same.

AFFIRMATIVE DEFENSE ONE. Petitioner has failed to set forth a claim upon which relief may be granted at least because Petitioner has set forth a single count founded upon separate transactions or occurrences.

AFFIRMATIVE DEFENSE TWO. Registrant has had a *bona fide* intention to use and/or has used and continues to use the mark POWER MANIA in commerce, such mark creating the impression of being essentially the same mark as POWERMANIA BINGO, for some or all of the goods set forth in the registration.

Respectfully submitted,

/Charles Fallow/

Charles W. Fallow, Attorney for Registrant

Shoemaker and Mattare, Ltd.
10 Post Office Road - Suite 100
Silver Spring, Maryland 20910
October 8, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION was served upon Petitioner by mailing via first class mail, postage prepaid, to

Kelley L. Nyquist

Brownstein Hyatt Farber Schreck, LLP

100 North City Parkway, Suite 1600

Las Vegas, Nevada 89106-4614

this 8th day of October, 2014.

Robyn S. Badman