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

Proceeding	92058492
Party	Defendant Doolittle, Rebekah A
Correspondence Address	REBEKAH A DOOLITTLE 20610 LAFAYETTE CIRCLE ELKHORN, NE 68022 UNITED STATES beka@thepinkstore.com
Submission	Answer
Filer's Name	Christopher M. Bikus
Filer's e-mail	pto-om@huschblackwell.com
Signature	/Christopher M. Bikus/
Date	02/19/2014
Attachments	Answer.pdf(17041 bytes)

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

VICTORIA'S SECRET STORES BRAND)	
MANAGEMENT, INC.,)	
)	Cancellation No. 92058492
Petitioner,)	
)	Reg. No. 4,336,508
v.)	
)	Mark: THE PINK STORE
REBEKAH DOOLITTLE,)	
)	
Registrant.)	

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Rebekah Doolittle, a United States citizen residing at 20610 Lafayette Circle, Elkhorn, NE 68022 ("Registrant"), in answer to the Cancellation of the Petitioner, Victoria's Secret Stores Brand Management, Inc. ("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 for Cancellation 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 for Cancellation and accordingly, denies the same.

3. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 3 of the Petition for Cancellation and accordingly, denies the same.

4. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 4 of the Petition for Cancellation and accordingly, denies the same.

5. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 5 of the Petition for Cancellation and accordingly, denies the same.

6. Registrant admits that Victoria's Secret website contains its PINK Brand on its website; however Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 6 of the Petition for Cancellation and accordingly, denies the same.

7. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 7 of the Petition for Cancellation and accordingly, denies the same.

8. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 8 of the Petition for Cancellation and accordingly, denies the same.

9. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 9 of the Petition for Cancellation and accordingly, denies the same.

10. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 10 of the Petition for Cancellation and accordingly, denies the same.

11. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 11 of the Petition for Cancellation and accordingly, denies the same.

12. Registrant admits that the United States Patent and Trademark Office (“USPTO”) lists Petitioner as the owner of the federal trademark registrations set forth in paragraph 12 of the Petition for Cancellation.

13. Registrant admits the allegations set forth in paragraph 13 of the Petition for Cancellation.

14. Registrant admits that on January 25, 2013, the Examining Attorney assigned to Application Serial No. 85/792,922 and Application Serial No. issued office actions citing numerous third party registrations and applications, including, but not limited to, Registrant’s then pending application, as potential bars to registration of Petitioner’s PINK applications.

15. Registrant admits the allegations set forth in Paragraph 15 of the Petition for Cancellation.

16. Registrant admits the allegations set forth in Paragraph 16 of the Petition for Cancellation.

17. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 17 of the Petition for Cancellation and accordingly, denies the same.

18. Registrant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 18 of the Petition for Cancellation and accordingly, denies the same.

19. Registrant admits that she was aware of VS and its use of the PINK Brand prior to September 1, 2011, however, Registrant further states that the existence of VS and its use of the PINK Brand had no bearing on Registrant’s selection of the mark THE PINK STORE.

20. Paragraph 20 of the Petition for Cancellation calls for legal conclusions to which no response is required. To the extent an answer is required, however, Registrant denies the same.

21. Paragraph 21 of the Petition for Cancellation calls for legal conclusions to which no response is required. To the extent an answer is required, however, Registrant denies the same.

22. Paragraph 22 of the Petition for Cancellation calls for legal conclusions to which no response is required. To the extent an answer is required, however, Registrant denies the same.

WHEREFORE, Registrant prays that:

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

Dated this 19th day of February, 2014.

REBEKAH DOOLITTLE

By /s/ Christopher M. Bikus
Christopher M. Bikus
Husch Blackwell LLP
13330 California Street, Suite 200
Omaha, NE 68154
Tel: 402-964-5144
Fax: 402-964-5050
pto-om@huschblackwell.com

ATTORNEYS FOR REGISTRANT

CERTIFICATION UNDER 37 C.F.R. § 1.8

I hereby certify that REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION is being filed electronically with the United States Patent and Trademark Office utilizing the *Electronic System for Trademark Trials and Appeals* this 19th day of February, 2014.

/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 FOR CANCELLATION was mailed first class, postage prepaid on this 19th day of February, 2014 to the following:

Kevin C. Parks, Esq.
Michelle L. Zimmerman, Esq.
Leydig, Voit & Mayer, Ltd.
Two Prudential Plaza, 180 N. Stetson Ave., Ste. 4900
Chicago, Illinois 60601-6731

/s/ Christopher M. Bikus

Christopher M. Bikus