

ESTTA Tracking number: **ESTTA652160**

Filing date: **01/26/2015**

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

Proceeding	92058700
Party	Defendant Basha Holdings, LLC
Correspondence Address	BASHA HOLDINGS LLC 217 W 16TH STREET, APT B NEW YORK, NY 10011 UNITED STATES smeleen@pirkeybarber.com, wlarson@pirkeybarber.com, ryounger@pirkeybarber.com, eolson@pirkeybarber.com, tmcentral@pirkeybarber.com
Submission	Answer
Filer's Name	Wendy C. Larson
Filer's e-mail	smeleen@pirkeybarber.com, wlarson@pirkeybarber.com, ryounger@pirkeybarber.com, eolson@pirkeybarber.com, tmcentral@pirkeybarber.com
Signature	/WCL/
Date	01/26/2015
Attachments	Answer to Notice of Cancellation.pdf(10135 bytes )

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

TEQUILA HOLDINGS INC.,	§	
	§	
Petitioner,	§	Cancellation No. 92058700
v.	§	
	§	
BASHA HOLDINGS, LLC,	§	
	§	
Registrant.	§	
	§	

**ANSWER TO NOTICE OF CANCELLATION**

Basha Holding, LLC (“Registrant”) responds to the Notice of Cancellation as follows.  
The paragraph numbers below correspond to those in the Petition for Cancellation.

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.
2. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.
3. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.
4. To the extent paragraph 4 contains any allegations to which a response is required, Registrant responds that it is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.
5. Registrant admits the allegations in the first sentence of paragraph 5. Registrant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and therefore denies them.

6. Registrant admits the allegations in the first sentence of paragraph 6. Registrant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and therefore denies them.

7. Admitted.

8. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

9. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

10. Denied.

11. Denied.

12. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

13. Denied.

14. Denied.

15. Paragraph 15 contains legal conclusions to which no response is necessary. To the extent any allegations require a response, Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

16. Denied.

17. To the extent paragraph 17 contains any allegations to which a response is required, Registrant responds that it is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

**AFFIRMATIVE DEFENSES**

Petitioner is barred by the doctrine of laches, acquiescence, and estoppel from asserting any of the claims in its Notice.

WHEREFORE, Registrant requests that the Notice of Cancellation be rejected and judgment be entered in favor of Registrant.

Dated: January 26, 2015

Respectfully submitted,

/Wendy C. Larson/

Stephen P. Meleen  
Wendy C. Larson  
PIRKEY BARBER PLLC  
600 Congress Avenue, Suite 2120  
Austin, Texas 78701  
Telephone: 512-322-5200  
Telecopier: 512-322-5201

ATTORNEYS FOR REGISTRANT

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing ANSWER TO NOTICE OF CANCELLATION was served by first class mail on January 26, 2015 upon Petitioner's attorney:

Lee Fredric Sharra  
Attorney At Law  
4313 Trouthaven Drive  
Murrysville, PA 15668

/Wendy C. Larson/\_\_\_\_\_