

ESTTA Tracking number: **ESTTA615305**

Filing date: **07/14/2014**

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

Proceeding	92059305
Party	Defendant Theodore A Stoner
Correspondence Address	THEODORE A STONER 99 S DOWNING ST , #501 DENVER, CO 80209 UNITED STATES ladinc123@aol.com
Submission	Answer
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	07/14/2014
Attachments	Answer.pdf(163879 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

In the matter of U.S. Registration 3,700,403
For the mark BONGO BI-LINGO BUDDY
Registered on the Principal Register on October 20, 2009

MWR Holdings, LLC,	:	
	:	
Petitioner,	:	
	:	
vs.	:	Cancellation No. 92059305
	:	
Stoner, Theodore A.,	:	
	:	
Registrant.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW Registrant, Theodore A. Stoner (hereinafter “Registrant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Petition to Cancel and in response to Petitioner’s allegations states as follows:

ANSWER

Registrant denies the allegations set forth in the Introductory Paragraph of the Petition to Cancel and demands strict proof thereof. In response to the specifically enumerated paragraphs, the Registrant states as follows:

1. Registrant is without knowledge of the allegations set forth in Paragraph 1 of the Petition to Cancel and therefore denies the same.
2. Registrant denies the allegations set forth in Paragraph 2 of the Petition to Cancel and demands strict proof thereof.
3. Registrant denies the allegations set forth in the last sentence of Paragraph 3 as phrased and demands strict proof thereof; otherwise, Registrant admits the allegations set forth in Paragraph 3 of the Petition to Cancel.

4. Registrant is without knowledge of the allegations set forth in Paragraph 4 of the Petition to Cancel and therefore denies the same.

5. Registrant is without knowledge of the allegations set forth in Paragraph 5 of the Petition to Cancel and therefore denies the same.

6. Registrant is without knowledge of the allegations set forth in Paragraph 6 of the Petition to Cancel and therefore denies the same.

7. Registrant denies the allegations set forth in Paragraph 7 of the Petition to Cancel and demands strict proof thereof.

8. Registrant is without knowledge of the allegations set forth in Paragraph 8 of the Petition to Cancel and therefore denies the same.

9. Registrant denies the allegations set forth in Paragraph 9 of the Petition to Cancel and demands strict proof thereof.

10. Registrant denies the allegations set forth in Paragraph 10 of the Petition to Cancel and demands strict proof thereof.

11. Registrant denies the allegations set forth in Paragraph 11 of the Petition to Cancel and demands strict proof thereof.

Registrant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Registrant prays that the Petition to Cancel be dismissed.

Respectfully submitted this 14th day of July, 2014.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Registrant

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	:	
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 14th day of July, 2014 to
be served, via first class mail, postage prepaid, upon:

Elliot Lipins
Tutunjian & Bitetto P.C.
425 Broadhollow Rd, Suite 302
Melville, NY 11747

/Matthew H. Swyers/
Matthew H. Swyers