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

Proceeding	92059866
Party	Defendant Taryn Rodighiero dba KaiKini
Correspondence Address	TARYN RODIGHIERO 6250 OLOHENA ROAD KAPAA, HI 96746 UNITED STATES Taryn@Kaikini.com
Submission	Answer
Filer's Name	Morris E. Turek
Filer's e-mail	morris@yourtrademarkattorney.com
Signature	/met20/
Date	09/13/2014
Attachments	Rodighiero Answer.pdf(131858 bytes )

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

**Kini Kai, L.L.C.** )  
Petitioner, )  
v. ) Cancellation No. 92059866  
**Taryn Rodighiero** )  
Registrant. )  
\_\_\_\_\_ )

**REGISTRANT’S ANSWER TO PETITIONER’S  
PETITION FOR CANCELLATION**

In answer to the Petition for Cancellation filed by Petitioner Kini Kai, L.L.C., Registrant Taryn Rodighiero states the following:

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 1 of the Petition for Cancellation and, accordingly, denies each and every allegation set forth therein.
2. Registrant admits the allegations set forth in Paragraph 2 of the Petition for Cancellation.
3. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 3 of the Petition for Cancellation and, accordingly, denies each and every allegation set forth therein.
4. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 4 of the Petition for Cancellation and, accordingly, denies each and every allegation set forth therein.

5. Registrant admits the allegations set forth in Paragraph 5 of the Petition for Cancellation.

### **FRAUD**

6. Registrant admits only that she submitted a sworn declaration to the PTO in connection with Application Serial No. 85419812, and that her application recited a first use in commerce date of at least as early as December 1, 2010. Registrant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in Paragraph 6 of the Petition for Cancellation and, accordingly, denies each and every remaining allegation set forth therein.

7. Registrant denies each and every allegation set forth in Paragraph 7 of the Petition for Cancellation.

8. Registrant denies each and every allegation set forth in Paragraph 8 of the Petition for Cancellation.

9. Registrant admits only that the PTO approved Application Serial No. 85419812 and that it resulted in Registration No. 4,149,388, which issued on May 29, 2012. Registrant denies each and every remaining allegation set forth in Paragraph 9 of the Petition for Cancellation.

10. Registrant denies each and every allegation set forth in Paragraph 10 of the Petition for Cancellation.

### **LIKELIHOOD OF CONFUSION**

11. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 11 of the Petition for Cancellation and, accordingly, denies each and every allegation set forth therein.



