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Filing date: **10/20/2014**

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

Proceeding	92060050
Party	Defendant Ross Symons
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Submission	Opposition/Response to Motion
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Date	10/20/2014
Attachments	USPTO-DefendAction.pdf(717572 bytes)

Mailed and Emailed: October 21, 2014

Cancellation No. 92060050

Registration Nos. 3023143 & 3026975

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NEW YORK, NY 10112

Cellco Partnership d/b/a

Verizon Wireless

v.

Ross Symons

1. Sony Computer Entertainment America LLC ("SCEA") is an American corporation of approximately 8,000 employees that predominantly develops and markets PlayStation Hardware and Software in the USA.
2. Big Ant Studios Pty Ltd an Australian company that develops software and games in partnership with SCEA for PlayStation devices and networks for use in the USA.
3. Ross Symons, owner of trademarks No. 3023143, 3026975 is Chief Executive Officer of Big Ant Studios.
4. Ross Symons, Big Ant Studios Pty Ltd, and SCEA have been developing various Video Games including the title known as "Street Luge" and "World Cup Street Luge".
5. At the Game Developers Conferences in San Francisco of 2011, 2012, 2013 Big Ant Studios privately and publicly displayed their SCEA PlayStation title "Street Luge".
6. In June 2014 at E3 Expo in Los Angeles, the largest video game exhibition in the world, SCEA displayed "Street Luge" to the public. This event and use of the Trademark has been widely reported in both electronic and print media.
7. At the Sony PlayStation E3 Expo Press Conference the CEO of SCEA, Andrew House, publicly displayed the "Street Luge" title as pictured below:



8. On 19 June 2014 Conan O'Brien featured SCEA "Street Luge" on The Tonight Show to millions of viewers across TV networks in the USA. The YouTube clip of this performance of "Street Luge" (link <https://www.youtube.com/watch?v=UKuS1BxVaSk>) has had 1,253,317 views at the time of writing.
9. The trademark Registrations No. 3023143 and 3026975 have been in continuous and bona fide use and have not been abandoned. We intend to defend this Cancellation action No. 92060050

Ross Symons
Chief Executive Officer

Big Ant Studios



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