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Filing date: **01/21/2015**

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

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|------------------------|---|
| Proceeding | 92060503 |
| Party | Defendant Wet Willie's Management Corp. |
| Correspondence Address | WET WILLIE'S MANAGEMENT CORP PO BOX 60127 SAVANNAH, GA 31420 UNITED STATES |
| Submission | Answer |
| Filer's Name | Nadya Sand |
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| Signature | /Nadya Sand/ |
| Date | 01/21/2015 |
| Attachments | Naked Willie Answer.pdf(120554 bytes) |

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

IN THE MATTER OF U.S. REGISTRATION NO. 3,725,341

Mark: NAKED WILLIE

Registered: December 15, 2009

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| NAKED WINES LLC Petitioner, v. WET WILLIE’S MANAGEMENT CORP. Registrants. | Cancellation No. 92060503 |
|---|---------------------------|

REGISTRANT’S ANSWER TO PETITION FOR CANCELLATION

Registrant Wet Willie’s Management Corp. (“Registrant”), hereby sets forth its Answer to the Petition for Cancellation filed by Naked Wines LLC (“Petitioner”). Registrant answers the enumerated paragraphs of Petitioner’s Petition for Cancellation as follows:

1. Registrant admits that it is a Florida corporation having a mailing address of P.O. Box 60127, Savannah, Georgia 31420. Registrant also admits that it owns Registration No. 3,725, 341 for the mark NAKED WILLIE for “liquid non-alcoholic cocktail mixes, namely, daiquiri-flavored mixes” and “alcoholic beverages, namely, a frozen daiquiri cocktail drink; liquid alcoholic cocktail mixes, namely, daiquiri-flavored mixes,” registered on December 15, 2009. Registrant denies that Petitioner will be damaged by registration of the mark NAKED WILLIE that is the subject of U.S. Trademark Registration No. 3,725,341. Registrant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 1 and therefore denies the same.

2. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 and therefore denies the same.

3. Registrant denies the allegations of Paragraph 3.

4. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 and therefore denies the same.

5. Registrant denies the allegations of Paragraph 5.

6. Registrant denies the allegations of Paragraph 6.

7. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 and therefore denies the same.

8. Registrant denies the allegations of Paragraph 8.

9. Registrant denies the allegations of Paragraph 9.

10. Registrant denies the allegations of Paragraph 10.

First Affirmative Defense

Registrant's claims are barred, in whole or in part, by the doctrine of laches.

Respectfully submitted, this 21st day of January, 2015.

/s/ /Nadya Munasifi Sand/
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*Attorneys for Registrant Wet Willie's
Management Corp.*

CERTIFICATE OF SERVICE

I certify that the foregoing "Registrant's Answer to Petition for Cancellation" was served on Petitioner by mailing a copy of same by U.S. first class mail, postage prepaid, on the 21st day of January, 2015, to Petitioner's counsel, addressed as follows:

Hillary A. Brooks
Marger Johnson & McCollom PC
210 SW Morrison Street, Suite 400
Portland, Oregon 97204

/s/ /Nadya M. Sand/ _____
Nadya M. Sand