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

Proceeding	92061499
Party	Plaintiff Vice Media LLC and Vice Media Canada Inc.
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Signature	/Lawrence R. Robins/
Date	09/01/2015
Attachments	Answer to Registrant's Counterclaim-Vice Media v. Kaveh Harounian(B1916856).pdf(150129 bytes )



6. Denied.
7. Paragraph 7 is not an allegation of fact and does not require an answer.
8. Admitted.

**First Basis for Cancellation – Ownership of Prior Registration**

9. Admitted.
10. Petitioners, Counterclaim-Defendants admit that Registrant, Counterclaim-Plaintiff's "claimed" date of first use predates October 31, 1994.

11. Denied.

**Second Basis for Cancellation – Likelihood of Confusion**

12. Paragraph 12 states a legal conclusion and does not require an answer.
13. Paragraph 13 states a legal conclusion and does not require an answer.
14. Paragraph 14 states a legal conclusion and does not require an answer.

**AFFIRMATIVE DEFENSES**

As and for its affirmative defenses herein, Petitioners, Counterclaim-Defendants allege as follows:

**First Affirmative Defense**

15. The Counterclaim, and each and every purported claim for relief therein, fails to state claims upon which relief may be granted.

**Second Affirmative Defense**

16. The Registrant, Counterclaim-Plaintiff, comes to this Court, with unclean hands, and is precluded at law and in equity from asserting any of the claims purported to be set forth in the Counterclaim.

**Third Affirmative Defense**

17. The Registrant, Counterclaim-Plaintiff, is barred from obtaining the relief requested in the Counterclaim under the equitable doctrines of laches, acquiescence, and estoppel.

WHEREFORE, Petitioners, Counterclaim-Defendants respectfully requests that Registrant, Counterclaim-Plaintiff's Counterclaim be dismissed with prejudice.

Respectfully submitted,

VICE MEDIA LLC and VICE MEDIA CANADA INC.

By their attorneys,

Dated: September 1, 2015

/s/ Lawrence R. Robins  
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**CERTIFICATE OF SERVICE**

Pursuant to C.F.R. § 2.11, I hereby certify that a true and correct copy of the foregoing Petitioners', Counterclaim-Defendants' Answer to Registrant, Counterclaim-Plaintiff's Counterclaim was served, marked first class mail, postage prepaid, on Respondent, at the following address:

Sarah Silbert and Robert Berliner  
Berliner & Associates  
55 West Fifth Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90013

Date: September 1, 2015

/s/ Lawrence R. Robins  
Lawrence R. Robins, Esq.