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Filing date: **08/31/2015**

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

Proceeding	92061938
Party	Defendant Great Eagle Lighting Corporation
Correspondence Address	GREAT EAGLE LIGHTING CORPORATION ATTN JOHNY LAU, 56-35 207 STREET OAKLAND GARDENS, NY 11364 UNITED STATES johnylau.jl@gmail.com, johnylau@aol.com
Submission	Answer
Filer's Name	Anthony M. Verna III
Filer's e-mail	anthony@vernalaw.com
Signature	/s Anthony M. Verna III s/
Date	08/31/2015
Attachments	answer - Great Eagle Lighting.pdf(245652 bytes )

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

General Electric Company	)	Cancellation No.: 92061938
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Great Eagle Lighting Corporation	)	
	)	
Defendant	)	
	)	
	)	
	)	
	)	
	)	
	)	

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**ANSWER**

Great Eagle Lighting Corporation (“Defendant” or “Registrant”), through its attorney, Anthony M. Verna III, hereby answers the Petition for Cancellation that General Electric Company (“Petitioner”) filed on July 30, 2015 as follows:

1. Registrant does not have enough information to either admit or deny the averments of this paragraph.
2. Registrant does not have enough information to either admit or deny the averments of this paragraph.
3. Registrant does not have enough information to either admit or deny the averments of this paragraph.
4. Registrant does not have enough information to either admit or deny the averments of this paragraph.
5. Registrant does not have enough information to either admit or deny the averments of this paragraph.
6. Registrant does not have enough information to either admit or deny the averments of this paragraph.
7. Registrant does not have enough information to either admit or deny the averments of this paragraph.
8. Registrant does not have enough information to either admit or deny the averments of this paragraph.

9. Registrant does not have enough information to either admit or deny the averments of this paragraph.
10. Registrant does not have enough information to either admit or deny the averments of this paragraph.
11. Registrant does not have enough information to either admit or deny the averments of this paragraph.
12. Registrant does not have enough information to either admit or deny the averments of this paragraph.
13. Registrant does not have enough information to either admit or deny the averments of this paragraph.
14. Registrant does not have enough information to either admit or deny the averments of this paragraph.
15. Registrant admits the averments of this paragraph.
16. Registrant admits the averments of this paragraph.
17. No need to respond to this paragraph.
18. Registrant admits or denies as in paragraphs 1-17.
19. Registrant denies the averments of this paragraph.
20. Registrant denies the averments of this paragraph.
21. Registrant denies the averments of this paragraph.
22. Registrant denies the averments of this paragraph.
23. Registrant denies the averments of this paragraph.
24. Registrant denies the averments of this paragraph.
25. Registrant denies the averments of this paragraph.
26. Registrant admits or denies paragraphs 1-26 as above.
27. Registrant denies the averments of this paragraph.
28. Registrant denies the averments of this paragraph.
29. Registrant denies the averments of this paragraph.

### **Defenses/Amplifications**

30. Registrant's mark has a radically different appearance than Petitioner's marks.
31. Registrant's mark represents radically different goods/services than the goods/services that Petitioner's marks represents.
32. Registrant's goods/services are sold to different consumers than Petitioner's goods/services.
33. Registrant's goods/services are advertised in different channels of marketing than Petitioner's goods/services.
34. Registrant's goods/services have radically different price points than Petitioner's goods/services.
35. Registrant's goods/services are not economically related to Petitioner's goods/services.
36. Both of Registrant's marks registered on October 9, 2012. There was a period in which the Petitioner had to oppose the marks, but chose not to. Now, three years after the registration of the marks, Petitioner files. Petitioner has been slow and *laches* has attached to this case.

Wherefore, Great Eagle Lighting Corporation requests that the cancellation to U.S. Registration Numbers 4223341 and 4223355 be denied.

Dated: August 31, 2015

/s Anthony M. Verna III  
Anthony M. Verna III, Esq.  
170 Kings Ferry Road, Fl 2  
Montrose, NY 10548

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Plaintiff,	)	
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	)	
Great Eagle Lighting Corporation	)	
	)	
Defendant	)	
	)	
	)	
	)	
	)	
	)	

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 31<sup>st</sup> day of August 2015, a copy of the foregoing Answer was served via First Class Mail, postage prepaid, on the following:

Rodrick J. Enns  
939 Burke Street  
Winston-Salem, NC 27101

Respectfully submitted,

Dated this August 31, 2015

/s/ Anthony M. Verna III  
Anthony M. Verna III, Esq.  
170 Kings Ferry Road, Fl 2  
Montrose, NY 10548