

ESTTA Tracking number: **ESTTA702175**

Filing date: **10/14/2015**

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

Proceeding	92062104
Party	Defendant Plug And Play Consulting
Correspondence Address	DANIEL BARAZ PLUG AND PLAY CONSULTING 264 S LA CIENEGA BLVD, SUITE 1082 BEVERLY HILLS, CA 90211 UNITED STATES danny@plugandplayconsulting.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	10/14/2015
Attachments	answer - Plug and Play Consulting.pdf(283059 bytes)

Defenses

13. Registrant's LIQUID DATA trademark, U.S. Registration No. 4055582, was filed on March 9, 2011 and registered on November 15, 2011.
14. Petitioner filed this proceeding on August 24, 2015, almost four years after registration and over four years after filing the application.
15. Registrant has been using the LIQUID DATA trademark since at least as early as October 1, 2010.
16. Petitioner is barred by *laches* from proceeding in this matter, as Petitioner has waited a long time to file this proceeding.
17. Petitioner is barred by acquiescence from proceeding in this matter, as Petitioner has waited for such a long time to attempt to cancel Registrant's registration that Petitioner has relinquished any rights or claims to cancel Registrant's registration.

Wherefore, Plug And Play Consulting requests that the petition to U.S. Registration Number, 4055582, LIQUID DATA, be denied.

Dated: October 1, 2015

/s Anthony M. Verna III
Anthony M. Verna III, Esq.
Verna Law, P.C.
445 Hamilton Ave., Ste. 1102
White Plains, NY 10601

