

ESTTA Tracking number: **ESTTA718218**

Filing date: **01/04/2016**

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

Proceeding	92062697
Party	Defendant Saint Michael Imports Inc.
Correspondence Address	SAINT MICHAEL IMPORTS INC 10919 SW 40TH STREET MIAMI, FL 33165 UNITED STATES saintmichaelimports@yahoo.com
Submission	Answer
Filer's Name	Scott D. Smiley
Filer's e-mail	info@conceptlaw.com
Signature	/Scott D. Smiley, Reg. 55627/
Date	01/04/2016
Attachments	TTAB 92062697 Answer to Petition to Cancel.pdf(131953 bytes)

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

Distribuidora Mas Alla Llc,
Petitioner

v.

Saint Michael Imports Inc.,
Registrant

Petition to Cancel No. 92062697

Registration No. 4,264,063

Mark: MIEL DE AMOR

REGISTRANT’S ANSWER TO PETITION TO CANCEL

Saint Michael Imports Inc. (“Registrant”), by and through undersigned counsel, hereby submits this Answer in response to the Notice of Opposition filed in this matter by Distribuidora Mas Alla Llc (“Petitioner”). Unless specifically admitted below, Registrant denies each and every allegation in the Notice of Opposition. Registrant further answers the numbered paragraphs in the Notice of Opposition as follows:

1. Registrant affirms the allegation of Paragraph 1 of the Petition to Cancel.
2. Registrant denies the allegation of Paragraph 2 of the Petition to Cancel.
3. Registrant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 3 of the Petition to Cancel and therefore denies those allegations.
4. Registrant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 4 of the Petition to Cancel and therefore denies those allegations.
5. Registrant denies the allegation of Paragraph 5 of the Petition to Cancel.
6. Registrant denies the allegation of Paragraph 6 of the Petition to Cancel.

7. Registrant denies the allegation of Paragraph 7 of the Petition to Cancel.
8. Registrant denies the allegation of Paragraph 8 of the Petition to Cancel.
9. Registrant denies the allegation of Paragraph 9 of the Petition to Cancel.
10. Registrant denies the allegations of Paragraph 10 of the Petition to Cancel.

WHEREFORE, Registrant denies that Petitioner is entitled to any relief and requests that the Board dismiss the Petitioner's Notice of Opposition filed in this proceeding.

Dated: January 4, 2015

Respectfully submitted,

The Concept Law Group, P.A.

By: /Scott D. Smiley/
Scott D. Smiley
Museum Plaza
200 South Andrews Avenue
Suite 100
Fort Lauderdale, FL 33301
(754) 300-1500

Attorney for Registrant,
Saint Michael Imports Inc.

Certificate of Mailing and Service

I certify that on January 4, 2015, the foregoing ANSWER TO THE PETITION TO CANCEL is being served by mailing a copy thereof by U.S. first class mail to:

Seth Natter
Natter & Natter
501 Fifth Avenue
New York NY 10017

By: /Scott D. Smiley/
Scott D. Smiley
Museum Plaza
200 South Andrews Avenue
Suite 100
Fort Lauderdale, FL 33301
(754) 300-1500

Attorney for Registrant,
Saint Michael Imports Inc.