

TTAB



**In the United States Patent and Trademark Office Before
the Trademark Trial and Appeal Board**

Tai Chi Green Tea Inc

Registrant of Reg. NO. 4,114,136 (Cancellation No. 92062714)

**Cai, Zheng
Registrant,**

V.

Diamond Hong, Inc & H & C Trading Co. Inc.

Registrant Of Reg. No. 3,966,518

Petitioner

85327448

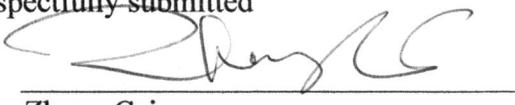
**Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of
Trade Mark "Wu Dang Tai Chi Green Tea"**

Dear Sir/Madam,

We found that the argument in the motion the petitioner filed on Jan 12th, 2016 is totally pointless and only a continuation of "arguing for argument's sake". The petitioner completely fails to acknowledge the fact that the evidence we listed in our response (we filed with Trademark Office on Dec 30, 2015) clearly proves that each of all their relevant arguments against our mark is completely groundless. We believe that the Trademark Trial and Appeal Board will firmly deny the petitioner's appeal based on our response filed with the Trademark Office on Dec 30, 2015. Therefore we believe we do not need to repeat our answers to the petitioner's appeal here to waste the Trademark Trial and Appeal Board's precious time.

Respectfully submitted

By


Zheng Cai

2/11/2016

Owner of Wu Dang Tai Chi Green Tea, Reg. NO. 4,114,136.
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02-08-2016

U.S. Patent and Trademark Office #72

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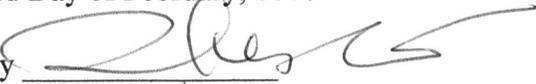
Dated: Feb 2rd, 2016

Certificate of Service

I hereby certify that a copy of the foregoing **Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of Trade Mark "Wu Dang Tai Chi Green Tea"** was served on:

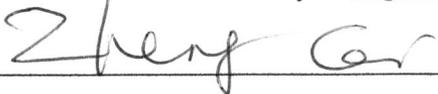
Kenneth Cang Li
Law Offices of Kenneth Cang Li
1745 Broadway, 17th Floor,
New York, NY 10019 United States

By placing same with the U. S. Postal Service, Via first class mail, postage pre-paid, this 2rd Day of February, 2016

By  2/1/2016
Name Zheng Cai
(Print out)

Certificate of Electronic Service

It is hereby certified that the foregoing **Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of Trademark "Wu Dang Tai Chi Green Tea"** was served electronically at <http://estta.uspto.gov> on this 2rd day of February, 2016

By 

Name Zheng Cai 2/1/2016