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

Proceeding	91211275
Party	Defendant Todd Sanders
Correspondence Address	ROBERT KLEINMAN KLEINMAN LAW FIRM 404 W 7TH ST AUSTIN, TX 78701-2808 robert@kleinmanlawfirm.com;lana@kleinma
Submission	Answer
Filer's Name	Robert Kleinman
Filer's e-mail	robert@kleinmanlawfirm.com
Signature	/robert kleinman/
Date	08/01/2013
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of Application Serial Nos. 85/832,870

Mark: VIOLET CROWN SODA

Published in the *Official Gazette* on June 18, 2013

VIOLET CROWN CINEMA AUSTIN, LLC

Opposer,

vs.

TODD SANDERS

Applicant.

Opposition Nos.: 91211275

AMENDED ANSWER¹

Applicant, Todd Sanders, by his attorneys, hereby answers the numbered paragraphs of the Notice of Opposition as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation in this paragraph, and it is therefore denied.
2. Applicant denies the allegation in this paragraph.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation in this paragraph, and it is therefore denied.
4. Applicant denies the allegation in this paragraph.
5. Applicant denies the allegation in this paragraph.

6. Applicant maintains a business presence at the specified address.
7. Applicant denies the allegation in this paragraph.
8. Applicant denies the allegation in this paragraph.
9. Applicant denies the allegation in this paragraph.
10. Applicant denies the allegation in this paragraph.
11. Applicant denies the allegation in this paragraph.
12. Applicant denies the allegation in this paragraph.

AFFIRMATIVE DEFENSES

13. Opposer's claims are barred by unclean hands, laches, estoppel, acquiescence, fraud, demurrer, failure to state a claim and other affirmative defenses permitted under TBMP 311.02(b).

WHEREFORE, Applicant prays that this Opposition be dismissed with prejudice and that the registration of the mark shown in Application Serial No. 85/832,870 be granted.

Date: August 1, 2013

Respectfully submitted,



Robert Kleinman
KLEINMAN LAW FIRM PLLC
404 West 7th Street
Austin, TX 78701
Tel: 512-299-5329
Fax: 512-628-3390

Attorney for Applicant

¹ Applicant's attorney initially identified the subject mark as merely "VIOLET CROWN" on the Original Answer. The full mark is "VIOLET CROWN SODA".

CERTIFICATE OF SERVICE

I certify that I have today caused the foregoing to be served upon Attorney of Record for Opposer via electronic transmission or other permitted means.



Robert Kleinman