

ESTTA Tracking number: **ESTTA1282812**

Filing date: **05/04/2023**

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

|                        |   |
|------------------------|---|
| Proceeding no.         | 91281645  |
| Party                  | Plaintiff<br>Lee S Dickinson  |
| Correspondence address | JACE WILLIAMS<br>GATEHOUSE LAW<br>3108 BLUE LAKE DRIVE<br>SUITE 200<br>VESTAVIA HILLS, AL 35173<br>UNITED STATES<br>Primary email: jace@gatehouse.law<br>Secondary email(s): lee@iamanempres.com, leesdickinson@gmail.com, trademarks@gatehouse.law<br>205-208-9595 |
| Submission             | Answer to Counterclaim  |
| Filer's name           | Jace Williams   |
| Filer's email          | jace@gatehouse.law  |
| Signature              | /Jace Williams/   |
| Date                   | 05/04/2023  |
| Attachments            | Opposers answer to counterclaim petition for cancellation-Dickinson.pdf (209154 bytes )   |

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

|                                   |   |                                |
|-----------------------------------|---|--------------------------------|
| <b>LEE S. DICKINSON,</b>          | ) |                                |
| <b>AN INDIVIDUAL</b>              | ) |                                |
|                                   | ) |                                |
| <b>OPPOSER,</b>                   | ) |                                |
|                                   | ) |                                |
| <b>V.</b>                         | ) | <b>OPPOSITION NO: 91281645</b> |
|                                   | ) |                                |
| <b>PRAY NOT PREY APPAREL, LLC</b> | ) |                                |
| <b>A MARYLAND LIMITED</b>         | ) |                                |
| <b>LIABILITY COMPANY</b>          | ) |                                |
|                                   | ) |                                |
| <b>APPLICANT.</b>                 | ) |                                |

**OPPOSER’S ANSWER TO APPLICANT’S COUNTERCLAIM PETITION FOR  
CANCELLATION**

In answer to the Counterclaim Petition for Cancellation filed by Pray Not Prey Apparel, LLC, Opposer states the following:

1. Opposer does not have sufficient information or knowledge to the allegations set forth in Paragraph 1 and accordingly denies each and every allegation contained therein.
2. Admitted Lee S. Dickinson is the current owner of US Registration Nos. 5886020, 5886035, and 6069563 and her current address is 2388 Kings Point Drive, Dunwoody, Georgia 30338.
3. Opposer denies the allegations contained in Paragraph 3.
4. Opposer denies the allegations contained in Paragraph 4.
5. Opposer admits the allegations contained in Paragraph 5.
6. Opposer admits the allegations contained in Paragraph 6.

7. Opposer admits the allegations contained in Paragraph 7.
8. Opposer denies the allegations contained in Paragraph 8.
9. Opposer denies the allegations contained in Paragraph 9.
10. Opposer admits the allegations contained in Paragraph 10.
11. Opposer admits the allegations contained in Paragraph 11.
12. Opposer admits the allegations contained in Paragraph 12.
13. Opposer denies the allegations contained in Paragraph 13.
14. Opposer denies the allegations contained in Paragraph 14.
15. Opposer admits the allegations contained in Paragraph 15.
16. Opposer admits the allegations contained in Paragraph 16.
17. Opposer denies the allegations contained in Paragraph 17.
18. Opposer denies the allegations contained in Paragraph 18.
19. Opposer admits the allegations contained in Paragraph 19.
20. Denied as written. On January 10, 2023, Opposer filed a “Response to Applicant’s Motion to Dismiss and Amended Notice of Opposition”.
21. Opposer denies the allegations contained in Paragraph 21.
22. Opposer denies the allegations contained in Paragraph 22.
23. Opposer denies the allegations contained in Paragraph 23.

24. Opposer denies the allegations contained in Paragraph 24.
25. Opposer denies the allegations contained in Paragraph 25.
26. Opposer denies the allegations contained in Paragraph 26.
27. Opposer denies the allegations contained in Paragraph 27.
28. Opposer denies the allegations contained in Paragraph 28.
29. Opposer denies the allegations contained in Paragraph 29.
30. Opposer denies the allegations contained in Paragraph 30.
31. Opposer denies the allegations contained in Paragraph 31.
32. Opposer denies the allegations contained in Paragraph 32.
33. Opposer denies the allegations contained in Paragraph 33.
34. Opposer denies the allegations contained in Paragraph 34.
35. Opposer denies the allegations contained in Paragraph 35.
36. Opposer denies the allegations contained in Paragraph 36.
37. Opposer denies the allegations contained in Paragraph 37.

Wherefore, Opposer denies Applicant is entitled to any relief and Opposer would be damaged by registration of Applicant's "Pray Not Pray" mark (Serial #97105218).

/s Jace Williams  
Jace Williams  
Jace@gatehouse.law  
Attorney for Opposer

**OF COUNSEL:**

Gatehouse Law  
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Birmingham, Alabama 35243  
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Facsimile: (205) 208-9596

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Amended Opposition Notice has been served by forwarding said copy on May 4, 2023, via email to:

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YourTrademarkAttorney.com  
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/s Jace Williams  
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