

ESTTA Tracking number: **ESTTA49217**

Filing date: **10/18/2005**

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

Proceeding	92044584
Party	Defendant Royal Crown Company, Inc. Royal Crown Company, Inc. 1000 Corporate Drive Ft. Lauderdale, FL 33334
Correspondence Address	Royal Crown Company, Inc. 1000 Corporate Drive Ft. Lauderdale, FL 33334
Submission	Answer
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Signature	/Laura Popp-Rosenberg/
Date	10/18/2005
Attachments	90044584 Answer to Petition for Cancellation.pdf (3 pages)

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

In the Matter of Trademark Registration Nos. 207,317 and 2,089,186
For the Mark NEHI

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200 KELSEY ASSOCIATES, LLC	:	Cancellation No. 92044584
	:	
Petitioner,	:	
	:	
-against-	:	
	:	
ROYAL CROWN COMPANY,	:	
	:	
Registrant.	:	
-----X	:	

ANSWER TO PETITION FOR CANCELLATION

Registrant Royal Crown Company, Inc. ("RCC") by its undersigned counsel Fross Zelnick Lehrman & Zissu, P.C. for its answer to the Petition for Cancellation states as follows:

1. As a preliminary matter, RCC notes that the address Petitioner provides for RCC is incorrect. In connection with the subject registrations, in June 2004, RCC filed with the Patent and Trademark Office ("PTO") change of correspondent address forms, changing the correspondence information for the registrations to an address of 900 King Street, Rye Brook, New York 10573. Further, in July 2005, RCC filed with the PTO change of owner address forms in connection with the subject registrations, changing the address of the registrant to the Rye Brook address.

2. Admits the allegations contained in paragraph 1 of the Petition for Cancellation.

3. Denies the allegations in paragraph 2 of the Petition for Cancellation that RCC has abandoned the NEHI mark and has no intent to re-establish use, denies knowledge or information concerning any investigation conducted by Petitioner or the results of such investigation other than to note that the results that are referred to in paragraph 2 are wholly false, and notes that Registrant RCC is currently using the mark NEHI in commerce in

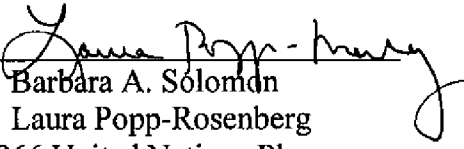
connection with soft drinks and non-alcoholic beverages.

4. Denies the allegations in paragraph 3 of the Petition for Cancellation.

WHEREFORE Registrant requests that the Petition for Cancellation be dismissed with prejudice in its entirety and that the Trademark Trial and Appeal Board grant to Registrant such other and further relief as it deems just and proper.

Dated: New York, New York
October 18, 2005

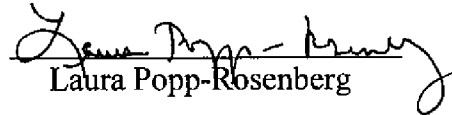
FROSS ZELNICK LEHRMAN & ZISSU, P.C.

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Attorneys for Registrant Royal Crown Company, Inc.

CERTIFICATE OF SERVICE

The undersigned, counsel for Registrant Royal Crown Company, Inc., hereby certifies that a true and correct copy of the attached ANSWER TO PETITION FOR CANCELLATION was served by First Class Mail, postage prepaid, on counsel for Petitioner on October 18, 2005 by mailing the same to Edmund J. Ferdinand, III, Grimes & Battersby, LLP, 488 Main Avenue, Third Floor, Norwalk, CT 06851.


Laura Popp-Rosenberg