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

Proceeding	92045378
Party	Defendant GLOBE UNION INDUSTRIAL CORP. GLOBE UNION INDUSTRIAL CORP. No.22, Chien-Kuo Road Taichung Export Processing Zone TWX Taichung,
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Date	03/27/2006
Attachments	00016094.PDF (4 pages)

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

<p>TOTO USA, INC.,</p> <p style="text-align: center;">Petitioner,</p> <p style="text-align: center;">v.</p> <p>GLOBE UNION INDUSTRIAL CORP.,</p> <p style="text-align: center;">Registrant.</p>	<p>Cancellation No. 92045378</p> <p>Registration No. 2,896,116 Mark: PLYMOUTH</p>
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ANSWER

Globe Union Industrial Corp. ("Registrant") answers and otherwise pleads to the First Amended Petition to Cancel its U.S. Registration No. 2,896,116 for the mark PLYMOUTH as set forth below. With respect to the preamble, and any unnumbered Paragraphs of the First Amended Petition to Cancel, Registrant denies that Petitioner is or will be damaged by the continued registration of Registrant's PLYMOUTH mark. Registrant lacks sufficient information to form a belief as to the truth or falsity as to the remaining allegations, and therefore denies them.

1. Registrant admits that on October 19, 2004, the United States Patent and Trademark Office ("PTO") issued U.S. Registration No. 2,896,116 to Registrant. Registrant admits that a copy of a printout of various pages from the PTO's TARR database concerning Registrant's U.S. Registration No. 2,896,116 was attached to the First Amended Petition to Cancel. To the extent that this Paragraph contains any other allegations, Registrant denies them.

2. Registrant admits that a copy of a printout of various pages from the PTO's TARR database concerning U.S. Application Serial No. 76/625,190 was attached to the First Amended Petition to Cancel. Registrant lacks sufficient information to form a belief as to the truth or falsity of the remaining allegations in Paragraph 2, and therefore denies them.

3. Registrant lacks sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 3 of the First Amended Petition to Cancel, and therefore denies them.

4. Registrant lacks sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 4 of the First Amended Petition to Cancel, and therefore denies them.

5. Registrant denies that Petitioner is or will be damaged by the existence of Registrant's registration. Registrant lacks sufficient information to form a belief as to the truth or falsity of the remaining allegations in Paragraph 5 of the First Amended Petition to Cancel, and therefore denies them.

AFFIRMATIVE DEFENSES

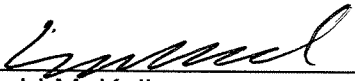
6. Petitioner has failed to state a claim upon which relief may be granted.

7. Petitioner's allegations are barred under the doctrines of laches, estoppel, and acquiescence.

WHEREFORE, Registrant prays that the Petition to Cancel be dismissed with prejudice.

Respectfully Submitted,

Dated: March 27, 2006



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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2006, a true and correct copy of the foregoing Answer was served by United States first class mail, postage prepaid, on counsel for Opposer:

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