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September 17, 2007

Commissioner for Trademarks
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, Virginia 22313-1451

73660672

Madam:


Transmitted herewith for filing is Respondent's Answer to Petition for Cancellation in the case of Hannah Holding, A.S., Petitioner, v. Specialty Retailers, Inc., Respondent, Cancellation No. 92047667. Also enclosed is a return, self-addressed postcard.

The Commissioner is hereby authorized to charge any fees required to file the answer in the above-mentioned case to Deposit Account No. 500449. A duplicate of this sheet is enclosed.

I hereby certify that this correspondence is being deposited in the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Trademarks, P.O. Box 1451, Alexandria, Virginia 22313-1451, on **September 17, 2007**.


Jennifer B. Rader

Respectfully submitted,


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Attorneys for Opposer



09-20-2007

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

HANNAH HOLDING A.S.,)
)
Petitioner,)
)
v.) Cancellation No. 92047667
)
SPECIALTY RETAILERS, INC.,)
)
successor in interest to Specialty Retailers (TX) L.P.)
)
Respondent.)

Commissioner for Trademarks
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER TO PETITION FOR CANCELLATION

Specialty Retailers (TX) L.P., a Texas limited partnership with a general partner of SRI General Partner, LLC has now merged into Specialty Retailers, Inc. The certificate of merger document was forwarded to the USPTO for recordation on September 17, 2007. Therefore, Specialty Retailers, Inc. ("Registrant") located and doing business at 10201 Main Street, Houston, Texas 77025 owns United States Trademark Registration No. 1,475,067 and hereby answers the Amended Petition for Cancellation of Hannah Holding a.s. ("Petitioner") as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of the averments set forth in paragraph 1 and based thereon denies each and every such averment.
2. Registrant is without knowledge or information sufficient to form a belief as to the truth of the averments set forth in paragraph 2 and based thereon denies each and every such averment.

3. Registrant is without knowledge or information sufficient to form a belief as to the truth of the averments set forth in paragraph 3 and based thereon denies each and every such averment.

4. Registrant is without knowledge or information sufficient to form a belief as to the truth of the averments set forth in paragraph 4 and based thereon denies each and every such averment.

5. Registrant is without knowledge or information sufficient to form a belief as to the truth of the averments set forth in paragraph 5 and based thereon denies each and every such averment. Registrant affirmatively avers that it is now the owner of United States Trademark Registration No. 1,475,067.

6. Registrant denies each and every averment set forth in paragraph 6.

7. Registrant denies each and every averment set forth in paragraph 7.

8. Registrant denies each and every other averment set forth in the Petition for Cancellation and not specifically addressed herein. Registrant specifically denies that Petitioner is damaged by registration of Registrant's trademarks.

AFFIRMATIVE DEFENSES

9. Registrant, through its predecessors in interest, has continuously used its HANNAH trademark (Registration No. 1475067) in interstate commerce since at least as early as May 29, 1975. An application to register the mark was filed May 14, 1987 and the mark registered on February 2, 1988. Based on Petitioner's United States Application Serial No. 79/031,406 and the pleaded registration of Petitioner's wholly owned subsidiary, United States Trademark Registration No. 3,150,420, upon information and belief, Petitioner cannot claim a priority date prior to May 15, 2002. Therefore, Registrant has prior and superior rights in and to

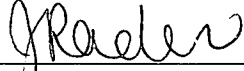
its HANNAH mark evidenced by United States Trademark Registration No. 1,475,067 that predates Petitioner's rights in United States Application Serial No. 79/031,406 for the HANNAH mark and United States Trademark Registration No. 3,150,120 for the H HANNAH OUTDOOR EQUIPMENT mark. Concurrently herewith, Registrant is filing a Petition to Cancel United States trademark Registration No. 3,150,120 owned by Petitioner's wholly owned subsidiary. To the extent Petitioner has rights in this registration, Registrant incorporates such petition to cancel as a counterclaim in this proceeding.

10. Petitioner's delay in bringing action against Registrant constitutes laches because, upon information and belief, for several years Petitioner had knowledge of and did not object to Registrant's use and/or registration of Registrant's mark evidenced by United States Trademark Registration No. 1,475,067 and Petitioner's assertion of rights at this time will severely prejudice Registrant.

11. Petitioner's inaction is barred by the doctrine of acquiescence because, upon information and belief, for several years Petitioner had knowledge of and did not object to Registrant's use and/or registration of Registrant's mark evidenced by United States Registration No. 1,475,067 and Petitioner's silence and inaction and delayed assertion of rights with respect to Registrant's mark and registration over a period of several years will materially prejudice Registrant.

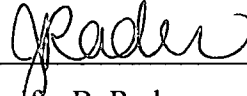
WHEREFORE, Petitioner prays that the Petition for Cancellation be dismissed in its entirety and requests that it be awarded such other and further relief as is deemed just and proper. Registrant deems that it is and will be damaged by United States Registration No. 3,150,420 and is filing a petition to cancel such registration herewith against Registrant's wholly owned subsidiary, Hannah Czech A.S.

I hereby certify that this correspondence is being deposited in the United States Postal Service as first class mail in an envelope addressed to: United States Patent and Trademark Office, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, Virginia 22313-1451, on **September 17, 2007**.



Jennifer B. Rader

Respectfully submitted,

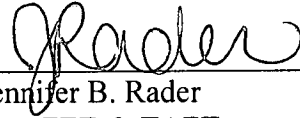


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Attorneys for Registrant

CERTIFICATE OF SERVICE

This is to certify that on this 17th day of September 2007, the foregoing ANSWER TO PETITION FOR CANCELLATION was mailed by first class mail, postage prepaid, to:

Thomas H. Van Hoozer
Michael Elbein
Cheryl Burbach
2405 Grand Boulevard, Suite 400
Kansas City, MO 64108-2519



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