

ESTTA Tracking number: **ESTTA377668**

Filing date: **11/09/2010**

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

Proceeding	92053001
Party	Defendant Princeton Vanguard, LLC
Correspondence Address	PRINCETON VANGUARD LLC 1209 ORANGE STREET WILMINGTON, DE 19808 UNITED STATES
Submission	Answer
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Date	11/09/2010
Attachments	Answer.PDF (4 pages)(46349 bytes)

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

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FRITO-LAY NORTH AMERICA, INC. :
Petitioner, :
v. : Cancellation No. 92053001
PPRINCETON VANGUARD, L.L.C. :
Registrant. :
: :
-----X

ANSWER

Registrant Princeton Vanguard, L.L.C. (“Registrant”), by its attorneys, Debevoise & Plimpton LLP, for its Answer to the Petition for Cancellation of Petitioner Frito-Lay North America, Inc. (“Petitioner”) against Registrant, states as follows:

1. Registrant denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Petition for Cancellation, except admits that Petitioner is engaged in the manufacture and sale of snack foods and is one of the largest manufacturers of snack foods in the United States.

2. Registrant denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Petition for Cancellation, except admits that Petitioner markets and sells a tremendous quantity of snack foods, including pretzels and crackers, throughout the United States, that Petitioner appears to

spend many millions of dollars on advertising and promoting its products, and that Petitioner's snack foods are sold in wide a range of outlets throughout the United States.

3. Registrant denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Petition for Cancellation, except admits that Petitioner is a longtime manufacturer of snack foods and its products include a number of snack food styles, flavors, and shapes.

4. Registrant admits the allegations contained in paragraph 4 of the Petition for Cancellation.

5. Registrant denies the allegations contained in paragraph 5 of the Petition for Cancellation.

6. Registrant denies the allegations contained in paragraph 6 of the Petition for Cancellation.

7. Registrant denies the allegations contained in paragraph 7 of the Petition for Cancellation.

8. Registrant denies the allegations contained in paragraph 8 of the Petition for Cancellation.

9. Registrant denies the allegations contained in paragraph 9 of the Petition for Cancellation.


* * *

WHEREFORE, Registrant, Princeton Vanguard L.L.C., respectfully requests judgment: (a) dismissing this action in its entirety with prejudice; and (b) ordering such other and further relief as the Board deems just and proper.

Dated: New York, New York
November 9, 2010

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP



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Attorneys for Registrant

Princeton Vanguard LLC


CERTIFICATE OF SERVICE

This is to certify that on November 9, 2010, I caused a copy of the foregoing
ANSWER to be served by e-mail upon:

Susan Hightower, Esq., shightower@pirkeybarber.com

William Barber, Esq., bbarber@pirkeybarber.com

Executed this 9th day of November, 2010 in New York, NY


Julie S. Suh