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

Proceeding	92054579
Party	Defendant BowTie, Inc.
Correspondence Address	BOWTIE INC 3 BURROUGHS IRVINE, CA 92618 UNITED STATES
Submission	Answer
Filer's Name	Michelle L. Visser
Filer's e-mail	interpartesparalegals@raderfishman.com
Signature	/Michelle L. Visser/
Date	10/24/2011
Attachments	answer.pdf (3 pages)(111852 bytes)

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

JULIA E. ROBITAILLE,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92054579
)	Registration No. 2,932,105
)	Mark: CLICKER TRAINING
BOWTIE, INC.,)	
)	
Registrant.)	
_____)	

ANSWER TO PETITION FOR CANCELLATION

Registrant, by and through its attorney identified below, for its Answer to the Petition for Cancellation, states as follows:

With respect to the first unnumbered paragraph of the Petition for Cancellation, Registrant denies that Petitioner has been or will be damaged by the continued registration of Registration No. 2,932,105. With regard to the remaining allegations in the first unnumbered paragraph, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

With respect to the second unnumbered paragraph, Registrant denies that the mark in Registration No. 2,932,105 is generic for the goods and services in this registration, namely “*printed publications, namely, magazines in the fields of animals and canine species*” in Class 16 and “*computer services, namely, providing online information in the fields of animals and canine species, via the Internet*” in Class 42. With regard to the remaining allegations of the second unnumbered paragraph, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

1. With regard to the allegations of numbered paragraph 1, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

2. With regard to the allegations of numbered paragraph 2, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

3. With regard to the allegations of numbered paragraph 3, Registrant denies that 15 U.S.C. §1062(b) identifies a basis for refusing registration based on likelihood of confusion. With regard to the remaining allegations of numbered paragraph 3, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

4. With regard to the allegations of numbered paragraph 4, Registrant has insufficient knowledge to be able to admit or deny such allegations, and therefore neither admits nor denies such allegations.

5. Registrant admits the allegations of numbered paragraph 5.

6. Registrant admits the allegations of numbered paragraph 6.

7. With regard to the allegations of numbered paragraph 7, Registrant admits that the application resulting in Registration No. 2,932,105 was filed on July 25, 2003.

8. Registrant denies the allegations of numbered paragraph 8.

9. Registrant denies the allegations of numbered paragraph 9.

AFFIRMATIVE DEFENSES

1. The Petition for Cancellation is barred by waiver.

2. The Petition for Cancellation is barred by estoppel.

Accordingly, Registrant respectfully requests that the Petition for Cancellation be dismissed with prejudice.

Respectfully submitted,

Date: October 24, 2011

By: s/Michelle L. Visser
Michelle L. Visser
RADER, FISHMAN & GRAUER PLLC
39533 Woodward Avenue
Suite 140
Bloomfield Hills, MI 48304
(248) 594-0600
Attorney for Registrant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing *Answer to the Petition for Cancellation* upon Petitioner by causing a true and correct copy thereof to be sent to:

Matthew H. Swyers
The Trademark Company
344 Maple Avenue West
Suite 151
Vienna, VA 22180

Date: October 24, 2011

s/Michelle L. Visser
Michelle L. Visser