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

Proceeding	92057500
Party	Defendant BeeNaturals, Inc.
Correspondence Address	NELSON D NOLTE NOLTE LAW FIRM 918 PONTOISON DR MANCHESTER, MO 63021 UNITED STATES nn@noltefirm.com
Submission	Answer
Filer's Name	Nelson D Nolte
Filer's e-mail	nn@noltefirm.com
Signature	/Nelson D. Nolte/
Date	06/01/2015
Attachments	answer to amended petition.pdf(23129 bytes)

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

ORBIS DISTRIBUTION, INC.)	
)	
Plaintiff,)	
)	Cancellation No. 92057500
v.)	
)	Reg. No. 3197276
BEE NATURALS, INC.)	
)	
Defendant.)	

ANSWER TO PETITION FOR CANCELLATION

Bee Naturals, Inc. (“Defendant”) hereby answers the allegations of the Amended Petition for Cancellation filed by Orbis Distribution, Inc. (“Petitioner”) and admits, denies and alleges as follows:

36A. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36B. Respondent admits that on January 8, 2007, Respondent requested materials for withdrawal of the administrative dissolution of a corporation. Respondent denies the remaining allegations of paragraph 36B.

36C. Denied.

36D. Denied. Respondent admits that Respondent’s then-attorney filed the Statement of Use on October 2, 2006.

36E. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36F. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36H. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36I. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36J. Denied.

36K. Denied.

36L. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36M. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36N. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

36O. Denied.

36P. Denied.

36Q. Denied.

36R. Denied.

36S. Denied.

43A. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

43B. Respondent admits that on January 8, 2007, Respondent requested materials for withdrawal of the administrative dissolution of a corporation. Respondent denies the remaining allegations of paragraph 43B.

43C. Denied.

44D. Denied. Respondent admits that Respondent's then-attorney filed the Combined Declaration of Use and Incontestability on July 3, 2013.

44E. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44F. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44H. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44I. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44J. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44K. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44L. This paragraph is a legal contention that requires no admission or denial. To the extent the paragraph requires admission or denial, it is denied.

44M. Denied.

44N. Denied.

44O. Denied.

44P. Denied.

WHEREFORE, RESPONDENT prays that the petition for cancellation be denied.

Respectfully Submitted,

By: /Nelson D. Nolte/
Nelson D. Nolte, Reg. No. 42,938
NOLTE LAW FIRM
918 Pontoison Dr.
Manchester, Missouri 63021
(314) 452-1211 Phone
(314) 266-6771 Fax
Attorney for Defendant BEENATURALS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing is being served via first class U.S. mail postage pre-paid this 1st day of June 2015 upon the following:

John M Bolger
Bolger Legal Group LLC
PO Box 170616
Whitefish Bay, WI 53217
Attorney for Plaintiff

/Nelson D. Nolte/