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

Proceeding	92057920
Party	Defendant Jacinto Romero and Ramiro Cerda
Correspondence Address	JACINTO ROMERO AND RAMIRO CERDA 3505 DOUBLETREE WAY MADERA, CA 93637 UNITED STATES cerda64@comcast.net
Submission	Answer
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Date	11/01/2013
Attachments	Answer to Petition for Cancellation YO NO FUI.pdf(10616 bytes)

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

Mark: YO NO FUI
Registration No.: 3599713
Date of Issue: March 31, 2009

Alessia Giacobino

Petitioner,

v.

Jacinto Romero and Ramiro Cerda

Registrants

Cancellation No. 92057920

ANSWER TO PETITION FOR CANCELLATION

Now comes Registrant Jacinto Romero, an individual having a place of residence at 3505 Doubletree Way, Madera, California 93637, and Registrant Ramiro Cerda, an individual having a place of residence at 3236 Riverview Drive, Madera, California 93637 (collectively, “Registrants”) and through their attorney answer the Petition for Cancellation in the matter of United States Trademark Registration No. 3599713 for YO NO FUI as follows:

1. Responding to Paragraph 1, Registrants admit that Petitioner sold goods in commerce in the United States under the name “Jo No Fui” in connection with clothing items, leather goods, handbags, and related goods, since at least as early as January 1, 2012. However, Registrants are without knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations of Paragraph 1, and therefore, deny each and every remaining allegation.

2. Registrants are without sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of Paragraph 2 and therefore deny each and every allegation.

3. Registrants deny the allegation in Paragraph 3.

4. Registrants are without sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of Paragraphs 4, 5, 6, and 7 and therefore deny each and every allegation contained in those Paragraphs.

5. Responding to Paragraph 8, Registrants admit that they are the owners of U.S. Trademark No. 3599713 for YO NO FUI. However, Registrants are without knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations of Paragraph 8 and therefore deny each and every remaining allegation.

6. Registrants deny each and every allegation contained in Paragraphs 9, 10, and 11.

WHEREFORE, Registrants request that the Petition for Cancellation be denied in all respects.

Respectfully submitted,

Dated: November 1, 2013

Law Offices of David B. Gibbs

By: s/David B. Gibbs/

David B. Gibbs (CSB #285729)

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Attorney for Registrants
JACINTO ROMERO, and
RAMIRO CERDA

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, I served a copy of this ANSWER TO PETITION FOR CANCELLATION on the attorney for Petitioner, as designated below, by placing said copy in the United States Mail, first class, postage prepaid, addressed as follows:

Wells IP Law, LLC
c/o Nicholas D. Wells, Esq.
299 S. Main St., Suite 1300
Salt Lake City, UT 84111

By: s/David B. Gibbs/

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