

ESTTA Tracking number: **ESTTA630369**

Filing date: **10/01/2014**

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

Proceeding	92059875
Party	Defendant Base Product Company
Correspondence Address	BASE PRODUCT COMPANY 9200 BROCKHAM WAY JOHNS CREEK, GA 30022 UNITED STATES
Submission	Answer
Filer's Name	Robin L. Gentry
Filer's e-mail	robin@lilenfeldpc.com, david@lilenfeldpc.com, wendy@lilenfeldpc.com
Signature	/Robin L. Gentry/
Date	10/01/2014
Attachments	Answer.pdf(10918 bytes )

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

PAUL HOWELL	)	Cancellation No. 92059875
(an individual),	)	
	)	
Petitioner,	)	In the matter of:
	)	
v.	)	Registration No.: 4,355,719
	)	Mark: POLICE
BASE PRODUCT COMPANY, a Georgia	)	Registered on June 18, 2013
Limited Liability Company,	)	
	)	<b><u>REGISTRANT’S ANSWER</u></b>
Registrant.	)	
_____	)	

In response to the above-captioned Petition to Cancel (“the Petition”) Registrant responds as follows:

**ADMISSIONS AND DENIALS**

Registrant responds to the specific allegations in the Petition as follows:

1. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 and therefore denies same.
2. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 and therefore denies same.
3. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3 and therefore denies same.
4. Registrant admits that its U.S. Registration No. 4,355,719 states a date of first use of May 9, 2012. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 4 and therefore denies same.
5. Paragraph 5 contains only a statement of law, which Registrant is not required to admit or deny. To the extent a response is required, Registrant is without knowledge or information

sufficient to form a belief as to the truth of the factual allegations of Paragraph 5 and therefore denies same.

6. Denied.

7. Denied.

8. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8 and therefore denies same.

This 1<sup>st</sup> day of October, 2014.

**LILENFELD PC**

/s/Robin L. Gentry

David M. Lilenfeld

Georgia Bar No.: 452399

Robin L. Gentry

Georgia Bar No.: 289899

Attorneys for Registrant

Buckhead Centre

2970 Peachtree Road N.W., Suite 530

Atlanta, Georgia 30305

(404) 201-2520 - telephone

(404) 393-9710 - facsimile

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

PAUL HOWELL	)	Cancellation No. 92057912
(an individual),	)	
	)	
Petitioner,	)	In the matter of:
	)	
v.	)	Registration No.: 4,355,719
	)	Mark: POLICE
BASE PRODUCT COMPANY, a Georgia	)	Registered on June 18, 2013
Limited Liability Company,	)	
	)	
Registrant.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of October 2014, I mailed a true and exact copy of the foregoing REGISTRANT'S ANSWER via first class mail, postage pre-paid to:

Carl J. Spagnuolo, Esq.  
McHale & Slavin PA  
2855 PGA Blvd.  
Palm Beach Gardens, FL 33410  
ustrademarks@mchaleslavin.com

This 1<sup>st</sup> day of October, 2014.

**LILENFELD PC**

*/s/Robin L. Gentry*

\_\_\_\_\_  
Robin L. Gentry