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

Proceeding	92060900
Party	Defendant VMedu, Inc.
Correspondence Address	VMEDU INC 410 N 44TH STREET, SUITE 240 PHOENIX, AZ 85008 UNITED STATES marketing@scrumstudy.com
Submission	Answer
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Signature	/Daniel C. DeCarlo/
Date	03/31/2015
Attachments	Cancellation 92060900 Answer.pdf(45929 bytes)

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

In the matter of U.S. Registration No. 4,631,080
For the mark SCT
Registered on November 4, 2014

SCRUM ALLIANCE, INC. ,)	
)	
Petitioner,)	
v.)	Cancellation No. 92060900
)	
VMEDU, INC.,)	
)	
Registrant.)	
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Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313
Attn: Trademark Trial and Appeal Board

ANSWER TO PETITION TO CANCEL REGISTRATION

Registrant VMEDU, INC. answers Scrum Alliance's Petition to Cancel Registration as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 1, and therefore denies those allegations.
2. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 2, and therefore denies those allegations.
3. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 3, and therefore denies those allegations.
4. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 4, and therefore denies those allegations.

5. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 5, and therefore denies those allegations.
6. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 6, and therefore denies those allegations.
7. Registrant admits the allegations of Paragraph 7.
8. Registrant admits the allegations of Paragraph 8.
9. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 9, and therefore denies those allegations.
10. Registrant is without knowledge or information sufficient to form a belief as to the truth of any of the allegations of Paragraph 10, and therefore denies those allegations.
11. Registrant denies the allegations of Paragraph 11.
12. Registrant denies the allegations of Paragraph 12.
13. Registrant denies the allegations of Paragraph 13 to the extent they allege that Registrant's counsel of record filed U.S. Application Serial No. 86/085,803. Registrant's counsel of record did not file said Application.
14. Registrant admits the allegations of Paragraph 14.
15. Registrant admits the allegations of Paragraph 15.
16. Registrant denies the allegations of Paragraph 16.
17. Registrant denies the allegations of Paragraph 17.

AFFIRMATIVE DEFENSES

1. As a first affirmative defense, Registrant avers that the Petition for Cancellation fails to state facts sufficient upon which a claim for relief may be granted.
2. As a second and separate affirmative defense, Petitioner is barred from seeking cancellation of the registrant's trademark under the equitable doctrines of estoppel, waiver, laches, unclean hands, and acquiescence.

3. As a third and separate affirmative defense, Petitioner has not and will not be damaged by the registration of the trademark "SCT" and therefore lacks standing to petition to cancel the registration.
4. As a fourth and separate affirmative defense, Petitioner's certification mark "CST" is invalid and subject to cancellation. But in any event, there can be no likelihood of confusion between "CST" and Registrant's service mark "SCT."

Registrant respectfully requests that the Petition to Cancel be denied, and that judgment be entered for Registrant.

Dated: March 31, 2015

Respectfully submitted,
Lewis Brisbois Bisgaard & Smith LLP

/s/ Daniel C. DeCarlo
Daniel C. DeCarlo
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Attorneys for Registrant

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CERTIFICATE OF SERVICE

I HEREBY certify that a true and complete copy of the foregoing ANSWER has been served on the attorney of record for Petitioner, SCRUM ALLIANCE, INC., by mailing a copy via First Class Mail, postage prepaid to:

David M. Perry
Matthew A. Homyk
BLANK ROME LLP
One Logan Square
Philadelphia, PA 19103-6998
UNITED STATES

BY: 
Name: Toni Espinoza

Date: March 31, 2015