

ESTTA Tracking number: **ESTTA731587**

Filing date: **03/07/2016**

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

Proceeding	92062866
Party	Defendant Interactive Corporation AKA Interactiv
Correspondence Address	INTERACTIV CORPORATION POST OFFICE BOX 613104 SAN JOSE, CA 95161 UNITED STATES interactivecorp@gmail.com
Submission	Answer
Filer's Name	James Chu
Filer's e-mail	interactivcorp@gmail.com
Signature	/James Chu/
Date	03/07/2016
Attachments	rawr-answer.PDF(193800 bytes) rawr-mailreciept.PDF(31208 bytes)

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

Cancellation No. **92062866**
In the matter of Registration No. **4242066**
For the design mark with literal elements **RAWR**
Date Registered **11/13/2012**

Futurefly Oy, Petitioner

v.

Interactiv Corporation, Registrant

ANSWER TO PETITION FOR CANCELLATION

Interactiv Corporation, herein ("Registrant"), hereby answers and responds to the Petition for Cancellation filed by Futurefly Oy, herein ("Petitioner") as follows:

Registrant denies the allegation in the first statement of the Petition for Cancellation that Petitioner believes that it is damaged by Registration No. 4242066. Registrant denies any alleged damage to Petitioner.

With respect to the grounds alleged for the cancellation, Registrant responds as follows, with the following numbered paragraphs corresponding to the numbers of the paragraphs of the Petition for Cancellation.

1. Registrant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in Paragraph 1 and therefore denies them.
2. Registrant admits to the allegations of Paragraph 2.
3. Registrant admits that its corporate name and address are as alleged and denies the remainder of the allegations of Paragraph 3.
4. Registrant admits to the allegations of Paragraph 4.
5. Registrant admits to the allegations of Paragraph 5.
6. Registrant admits to the allegations of Paragraph 6.
7. Registrant admits to the allegations of Paragraph 7.
8. Registrant denies to the allegations of Paragraph 8.
9. Registrant denies to the allegations of Paragraph 9.
10. Registrant admits to the specimen of use with its Application and denies the remainder of the

allegations of Paragraph 10.

11. Registrant denies to the allegations of Paragraph 11.

12. Registrant denies to the allegations of Paragraph 12.

13. Registrant admits to the allegations of Paragraph 13.

14. Registrant denies to the allegations of Paragraph 14.

15. Registrant denies to the allegations of Paragraph 15.

16. Registrant denies to the allegations of Paragraph 16.

17. Registrant admits ownership of the Registrant's Mark, and of the Registrant's exclusive right to use the mark in commerce and denies the remainder of the allegations of Paragraph 17.

Registrant further denies that Petitioner is entitled to the relief which it seeks.

AFFIRMATIVE DEFENSES

As the First Affirmative Defense to the Petition for Cancellation, Registrant alleges that Petitioner does not have sufficient knowledge or information to constitute grounds for cancellation against Registration No. 4242066.

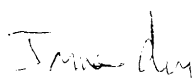
As the Second Affirmative Defense to the Petition for Cancellation, on information and evidences, Registrant obtained Registration No. 4242066 truthfully.

As the Third Affirmative Defense to the Petition for Cancellation, on information and evidences, Registrant has continuously used the Registration No. 4242066 in commerce.

Registrant hereby reserves the right to assert additional defenses that may become available or appear during discovery.

WHEREFORE, Registrant prays that this Petition for Cancellation be dismissed with prejudice and that judgment be entered in favor of Registrant.

Respectfully,

By: 

James Chu, CEO
Interactiv Corporation
PO Box 613104
San Jose, CA 95161
Tel: 408-676-9527
interactivcorp@gmail.com

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

Cancellation No. **92062866**
In the matter of Registration No. **4242066**
For the design mark with literal elements **RAWR**
Date Registered **11/13/2012**

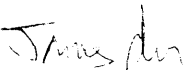
Futurefly Oy, Petitioner
v.
Interactiv Corporation, Registrant

ANSWER TO PETITION FOR CANCELLATION

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer to Petition for Cancellation was served upon Petitioner this 7th day of March 2016 by mailing a copy thereof via first-class mail to:

Geza Ziegler
Ziegler IP Law Group LLC
55 Greens Farms Road
Westport, CT 06880

By: 

James Chu, CEO
Interactiv Corporation
PO Box 613104
San Jose CA 95161
408-676-9527
interactivcorp@gmail.com

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

Cancellation No. **92062866**
In the matter of Registration No. **4242066**
For the design mark with literal elements **RAWR**
Date Registered **11/13/2012**

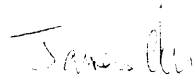
Futurefly Oy, Petitioner
v.
Interactiv Corporation, Registrant

ANSWER TO PETITION FOR CANCELLATION

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that the foregoing Answer to Petition for Cancellation is being filed with the U.S. Patent and Trademark Office via the Electronic System for Trademark Trials and Appeals (ESTTA) this 7th day of March 2016.

By:



James Chu, CEO
Interactiv Corporation
PO Box 613104
San Jose CA 95161
408-676-9527
interactivcorp@gmail.com

=====
SAN JOSE MPO APC 2
1750 LUNDY AVE
SAN JOSE, CA 95101-8000

03/07/2016 09:37:16 AM
=====

Sales Receipt table with columns: Product Description, Sale Qty, Unit Price, Final Price. Includes items like WESTPORT, CT 06880 Zone-8 First-Class Mail Letter and Issue Postage.

Paid by: VISA \$1.47
Account #: XXXXXXXXXXXX3138
Approval #: 683788
Transaction #: 030
23-902350248-99

SSK Transaction #: 8
USPS# #: 056834-9561

Thanks.
It's a pleasure to serve you.

ALL SALES FINAL ON STAMPS AND POSTAGE.
REFUNDS FOR GUARANTEED SERVICES ONLY.

Today's Postal Service is hiring!
Immediate openings available for
City Carrier Assistants (CCA) in many
locations nationwide! Apply today at
www.usps.com/employment.