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

Proceeding	92062923
Party	Defendant K & N Distributors
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Date	12/05/2016
Attachments	19 Answer to Amended Complaint.pdf(12903 bytes )

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

TOPICLEAR, INC.	:	
	:	
Petitioner,	:	
	:	
v.	:	Cancellation No. 92062923
	:	U.S. Reg. No. 4,818,656
K&N DISTRIBUTORS, INC.	:	Mark: TROPIC CLAIR PLUS
	:	Registered: September 22, 2015
Respondent	:	
	:	

**RESPONDENT’S ANSWER TO AMENDED PETITION FOR CANCELLATION**

Respondent, K & N Distributors, Inc. (hereinafter “Respondent”), by and through counsel, hereby answers Petitioner’s Amended Petition for Cancellation as follows.

**ANSWER**

Respondent is without knowledge of the allegations set forth in the Introductory Paragraphs of the Amended Petition for Cancellation, therefore denies the same. In response to the specifically enumerated allegations, Respondent states as follows:

1. Respondent is without knowledge of the allegations set forth in Paragraph 1 of the Amended Petition for Cancellation and therefore denies the same.
2. Respondent admits the allegations set forth in Paragraph 2 of the Amended Petition for Cancellation.
3. Respondent is without knowledge of the allegations set forth in Paragraph 3 of the Amended Petition for Cancellation and therefore denies the same.
4. Respondent is without knowledge of the allegations set forth in Paragraph 4 of the Amended Petition for Cancellation and therefore denies the same.

5. Respondent denies the allegations set forth in paragraph 5 of the Petition to Cancel as phrased and demands strict proof thereof. Respondent otherwise is without knowledge of the allegations set forth in Paragraph 5 of the Amended Petition for Cancellation and therefore denies the same.

6. Respondent is without knowledge of the allegations set forth in Paragraph 6 of the Amended Petition for Cancellation and therefore denies the same.

7. Respondent denies the allegations in Paragraph 7 of the Amended Petition for Cancellation.

8. Respondent denies the allegations in Paragraph 8 of the Amended Petition for Cancellation.

9. Respondent denies the allegations in Paragraph 9 of the Amended Petition for Cancellation.

10. Respondent denies the allegations in Paragraph 10 of the Amended Petition for Cancellation.

WHEREFORE, Respondent denies that Petitioner is entitled to the relief sought, and respectfully requests dismissal of Petitioner's Amended Petition for Cancellation.

Dated: December 5, 2016

Respectfully submitted,

/s/ Carrie A. Shufflebarger  
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Attorneys for Respondent K&N Distributors, Inc.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing is being served via U.S. Mail, with a courtesy copy via email, on the following, on this 5th day of December, 2016.

Donald L. Dennison  
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/s/ Carrie A. Shufflebarger  
Carrie Shufflebarger

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