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

Proceeding	92065038
Party	Defendant Alandra L. Washington
Correspondence Address	ALANDRA L WASHINGTON 625 MINGES RD E BATTLE CREEK, MI 49015 UNITED STATES Email: alandrawash@gmail.com
Submission	Answer
Filer's Name	Eugene J. Rath III
Filer's email	docket@flynnthiel.com
Signature	/Eugene J. Rath III/
Date	08/25/2017
Attachments	Answer082517.pdf(95579 bytes )

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

THE CELLULAR CONNECTION, LLC	)	Proceeding No. 92065038
Petitioner,	)	
v.	)	Registration No. 4,672,607
ALANDRA L. WASHINGTON,	)	
Registrant.	)	Mark: CULTURES FOR GOOD
	)	
	)	
	)	
	)	
	)	
	)	

**REGISTRANT’S ANSWER**

For her answer, Registrant Alandra L. Washington (“Registrant”) states as follows:

1. The allegations of Paragraph 1 are admitted.
2. Registrant denies that the services of her registration are in Class 36. The remaining allegations of Paragraph 2 are admitted.
3. It is admitted that, according to the Trademark Status and Document Retrieval database at uspto.gov, Petitioner filed a trademark application for CULTURE OF GOOD for the services as recited in Paragraph 3, which was assigned Serial No. 86/926,738. Registrant is without knowledge or information sufficient to form a belief as to the remaining allegations of Paragraph 3. Therefore, these allegations are denied.
4. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4. Therefore, the allegations are denied.
5. The allegations of Paragraph 5 are denied.
6. The first sentence of Paragraph 6, and citation thereafter, is a legal principle and citation for which no response is required. The factual allegations of Paragraph 6 are denied.

7. The allegations of Paragraph 7 are denied.
8. Admitted that the most recent post in the "blog" section of alandrawash.wixsite.com is dated October 19, 2014. The remaining allegations of Paragraph 8 are denied.
9. The allegations of Paragraph 9 are denied.
10. The allegations of Paragraph 10 are denied.

AFFIRMATIVE DEFENSE

1. Petitioner's allegations fail to state a claim upon which relief may be granted.

WHEREFORE, Registrant respectfully requests that this cancellation proceeding be dismissed with prejudice.

Respectfully Submitted,




Eugene J. Rath III  
Flynn Thiel Boutell & Tanis PC  
2026 Rambling Road  
Kalamazoo, MI 49008-1631  
gene.rath@flynnthiel.com  
ATTORNEYS FOR REGISTRANT

**CERTIFICATE OF SERVICE**

I, Eugene J. Rath III, hereby certify that a true and correct copy of the foregoing Answer has been served on Petitioner's attorney of record (identified below) by mailing said copy on August 25, 2017 via First Class Mail, postage prepaid, and by email to:

Denis V. Shamo  
BAKER & McKENZIE LLP  
2300 Trammell Crow Center  
2001 Ross Avenue  
Dallas, TX 75201  
E-mail: denis.shamo@bakermckenzie.com  
ATTORNEYS FOR PETITIONER

  
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Eugene J. Rath III