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

Proceeding	92068332
Party	Defendant Rogers International Limited
Correspondence Address	DOUGLAS L HENDRICKS MORRISON & FOERSTER LLP 425 MARKET STREET SAN FRANCISCO, CA 94105-2482 UNITED STATES
Submission	Answer
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Signature	/Jennifer Lee Taylor/
Date	05/22/2018
Attachments	Registrants Answer to Petition for Cancellation.pdf(538277 bytes)

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

ROGERS HIGH FIDELITY,

Petitioner,

vs.

ROGERS INTERNATIONAL LIMITED,

Registrant.

Cancellation No.: 92068332

Registration Nos.: 1,631,377 and
2,084,219

Marks: ROGERS

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Rogers International Limited ("Registrant") hereby answers the Petition for Cancellation of Registration Nos. 1,631,377 and 2,084,219 ("Petition for Cancellation") filed by Rogers High Fidelity ("Petitioner"):

1. Registrant admits the allegations in Paragraph 1 of the Petition for Cancellation.
2. Registrant admits the allegations in Paragraph 2 of the Petition for Cancellation.
3. Registrant admits the allegations in Paragraph 3 of the Petition for Cancellation.
4. Registrant admits the allegations in Paragraph 4 of the Petition for Cancellation.
5. Registrant states that to the extent the allegations in Paragraph 5 of the Petition for

Cancellation state conclusions of law, no response is required. Registrant denies the remaining allegations in Paragraph 5.

6. Registrant denies the allegations in Paragraph 6 of the Petition for Cancellation.

Attached hereto are images showing the ROGERS mark on certain products sold by Registrant in the United States.

7. Registrant states that to the extent the allegations in Paragraph 7 of the Petition for

Cancellation state conclusions of law, no response is required. Registrant is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 7 of the Petition for Cancellation, and on that basis denies the remaining allegations therein.

AFFIRMATIVE DEFENSE

1. Petitioner's Petition for Cancellation is barred by the doctrine of unclean hands, as Petitioner's Application Serial No. 87/638,358 for ROGERS HIGH FIDELITY claims that Petitioner has used the ROGERS HIGH FIDELITY mark in commerce for "Amplifiers; Sound reproduction apparatus" since at least as early as January 1, 2009, indicating that Petitioner has been infringing the marks registered in Registration Nos. 1,631,377 and 2,084,219 for over nine years.

WHEREFORE, Registrant prays:

1. That Petitioner's Petition for Cancellation be dismissed with prejudice; and
2. That any such further relief be granted to Registrant as may be deemed appropriate.

Respectfully submitted,

Dated: May 22, 2018

By:

Jennifer Lee Taylor
Attorney for Registrant
Rogers International Limited

Morrison & Foerster LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: (415) 268-6538
Facsimile: (415) 268-7522

CERTIFICATE OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 425 Market Street, San Francisco, California 94105-2482. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on May 22, 2018, I served a copy of:

REGISTRANT’S ANSWER TO PETITION FOR CANCELLATION

by electronically mailing a true and correct copy through Morrison & Foerster LLP’s electronic mail system to the e-mail address(es) set forth below.

Attorneys for Petitioner

Christopher M. Hennessey (chennessey@cohenkinne.com; tladeinde@cohenkinne.com)

Choen Kinne Valicenti & Cook LLP
28 North Street, 3rd Floor
Pittsfield, MA 01201

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed at San Francisco, California, this 22nd day of May, 2018.

Ryan Romain
(typed)

/s/ Ryan Romain
signature

EXHIBIT A



AT-LP1240-USB

QTY: 1 pc

N.W. 12.25 kg

G.W. 16.25 kg

NEAST 3

DIRECT DRIVE PROFESSIONAL TURNTABLE 200 & 400

Rogers

VU METER

CADET 300B
STEREO INTEGRATED
VALVE AMPLIFIER

Roadsun
express
1 822 2661 5065 F 822 2661 5068

AB Black
elves

Roadsun
express
1 822 2661 5065 F 822 2661 5068

EXHIBIT B



CODIA
Acoustic Design
Made in Korea

1 of 1

2

Rogers
CODE: AFI-38E
AUDIO OUTPUT TRANSFORMER

Rogers
CODE: PT-HB280
POWER SUPPLY TRANSFORMER

Rogers
CODE: AFI-38E
AUDIO OUTPUT TRANSFORMER

pedsun
express
1-822-2661-5068 F. 822-2661-5068

pedsun
express
1-822-2661-5068 F. 822-2661-5068

ck

EXHIBIT C



EXHIBIT D

