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

Proceeding	92070407
Party	Defendant Chubb INA Holdings Inc.
Correspondence Address	CHUBB INA HOLDINGS INC 436 WALNUT STREET PHILADELPHIA, PA 19106 UNITED STATES no email provided no phone number provided
Submission	Answer
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Date	03/02/2019
Attachments	ANSWER.pdf(95608 bytes)

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

AWP USA Inc.,	:	
	:	
Petitioner,	:	
	:	
v.	:	Cancellation No.: 92070407
	:	
Chubb INA Holdings, Inc.,	:	
	:	
	:	
Registrant.	:	

Hon. Commissioner for Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451

**REGISTRANT CHUBB INA HOLDINGS, INC.'S
ANSWER TO THE PETITION FOR CANCELLATION**

Chubb INA Holdings, Inc. (hereinafter "Chubb" or "Registrant"), Registrant in the above-captioned action, by and through its attorneys, Blank Rome LLP, submits this answer to the allegations contained in Petitioner AWP USA Inc.'s (hereinafter "Petitioner") Petition for Cancellation (the "Petition") as follows:

1. Chubb admits that Petitioner is listed on the U.S. Patent and Trademark Office database as the applicant of U.S. Trademark Application Number 87/901,868, which was filed on May 1, 2018. Chubb lacks sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 1 of the Petition and therefore denies the same.

2. Chubb lacks sufficient knowledge to admit or deny the allegations contained in Paragraph 2 of the Petition and therefore denies the same.

3. Admitted that Chubb filed an application for CHUBB TRAVEL SMART, U.S. Trademark Application Number 87/405,857 on April 10, 2017, and that its mark is now registered. Chubb denies the remaining allegations contained in Paragraph 3 of the Petition.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

AFFIRMATIVE DEFENSES

1. Petitioner is not entitled to any relief for which Petitioner prays.

2. Chubb has acted in good faith at all times.

3. Chubb presently has insufficient knowledge or information on which to form a belief as to whether there

may be additional, as yet unstated affirmative defenses.
Thus, subject to discovery in this proceeding, Chubb
expressly reserves its right to assert additional
affirmative defenses when and if they are appropriate.

* * *

WHEREFORE, Chubb, having fully and completely answered the
Petition for Cancellation, prays that final judgment be
entered:

A. Dismissing with prejudice the Petition for
Cancellation as presented in Proceeding No. 92070407; and

B. Granting Chubb such other and further relief as the
Board deems just and proper.

Respectfully submitted,
BLANK ROME LLP

Date: March 2, 2019

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*Attorneys for Chubb INA
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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2019 the foregoing was filed electronically with the TTAB and service was effected via electronic mail to the following counsel of record for Petitioner:

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/s/ Matthew A. Homyk
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