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


Proceeding	92071769
Party	Defendant Anaplan, Inc.
Correspondence Address	ANAPLAN INC 50 HAWTHORNE STREET SAN FRANCISCO, CA 94105 UNITED STATES no email provided 415-742-8199
Submission	Answer
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Date	11/20/2019
Attachments	TTAB Answer ANAPLAN.pdf(93800 bytes )

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

Addepar, Inc.,  <p style="text-align:right">Petitioner,</p> <p style="text-align:center">v.</p> Anaplan, Inc.	<p><b>Cancellation No.</b> 92071769 <b>Mark:</b> A &amp; Design <b>Registration No.</b> 5623416</p> <p style="text-align:right">Respondent</p>
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**RESPONDENT’S ANSWER**

Anaplan, Inc. (“Respondent”), hereby answers and otherwise pleads to the Petition for Cancellation filed by Addepar, Inc (“Petitioner”). As a preliminary matter, Respondent denies that Petitioner has been and will continue to be damaged by the continued registration of U.S.

Trademark Registration No. 5623414 for the mark  (the “Trademark”) in International Classes 09 and 42. Respondent’s address is 50 Hawthorne Street San Francisco, California 94105. Respondent is without knowledge or information sufficient to form a belief as to the truth of the remainder of the introductory statements in Petitioner’s Petition to Cancel, and therefore denies the same.

1. Admitted.
2. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2, and therefore denies the same.
3. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3, and therefore denies the same.
4. Respondent admits that the allegations of paragraph 4 reflect the records of the United States Patent and Trademark Office (“USPTO”).

5. Respondent admits that the allegations of paragraph 5 reflect the records of the USPTO.
6. Respondent admits that the allegations of paragraph 6 reflect the records of the USPTO.
7. Respondent admits that the allegations of paragraph 7 reflect the records of the USPTO.
8. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8, and therefore denies the same.
9. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9, and therefore denies the same.
10. Denied.
11. Denied.
12. Denied.

#### **AFFIRMATIVE DEFENSES**

1. Petitioner is not entitled to the relief sought because there is no likelihood of confusion between Petitioner's marks and Respondent's mark.
2. Respondent reserves the right to plead additional affirmative defenses as this matter progresses and as discovery progresses.

Respectfully submitted,

Date: November 20, 2019

*/s/ Julia Spoor Gard*

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Attorneys for Respondent

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of this Respondent's Answer has been served on November 20, 2019 via electronic mail to Petitioner's attorney of record: *efiling@knobbe.com*, *Jessica.Sganga@knobbe.com*, *Julia.Roberts@knobbe.com*, and *Lori.Yamato@knobbe.com*

*/s/ Kathleen S. Fennessy*