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Filing date: **12/15/2020**

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

Proceeding	92071980
Party	Defendant Godisghl, LLC
Correspondence Address	JOHN R SOMMER JOHN R SOMMER ATTORNEY AT LAW 17426 DAIMLER STREET IRVINE, CA 92614 UNITED STATES Primary Email: sommer@stussy.com 949-752-5344
Submission	Answer
Filer's Name	John R. Sommer
Filer's email	sommer@stussy.com
Signature	/John R. Sommer/
Date	12/15/2020
Attachments	Answer to Amended Petition.pdf(118160 bytes )

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

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ELEVATED FAITH, LLC,	:	Cancellation No.: 92071980
	:	
Petitioner,	:	Registration No.: 5187052
	:	
v.	:	Mark: G>^V
	:	
:	:	
GODISGHL, LLC,	:	
	:	
Registrant.	:	

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**ANSWER TO FIRST AMENDED PEITITON**

Registrant GODISGHL, LLC (“Registrant”), through its undersigned counsel, respectfully response to the First Amended Petition for Cancellation herein.

**The Parties**

1. Registrant has no information or belief concerning the allegations of Paragraph 1, and accordingly denies the same.
2. Registrant admits the allegations of Paragraph 2.
3. Registrant has no information or belief concerning the allegations of Paragraph 3, and accordingly denies the same.

**The Mark**

4. Registrant admits that it submitted an application on March 16, 2015 for the G>^V Mark, which is inherently distinctive. Registrant’s inspiration for the mark was in part “God is Greater than Highs and Lows.” Except as expressly admitted, Registrant denies the remaining allegations of Paragraph 4.

5. Registrant admits the first sentence of Paragraph 5 and that Exhibit is the Application. Registrant's statements in its Application speak for themselves. Registrant is not required to speculate on matters that were not required to be disclosed. Except as expressly admitted, Registrant denies the remaining allegations of Paragraph 5.

6. Registrant admits the allegations of Paragraph 6.

**Counts One to Four**

7. to 25. In accordance with the Board's order of July 14, 2020, striking Counts One to Four, no response thereto is required.

**Count Five**

26. Registrant has no information or belief concerning the allegations of Paragraph 3, and accordingly denies the same.

27. Registrant denies the allegations of Paragraph 27.

28. Registrant denies the allegations of Paragraph 28.

29. Registrant denies the allegations of Paragraph 29.

30. Registrant denies the allegations of Paragraph 30.

31. Registrant admits it uses the hashtag #GODISGHL. Except as expressly admitted, Registrant denies the remaining allegations of Paragraph 31.

32. Registrant denies the allegations of Paragraph 32. Registrant objects to the irrelevant reference to a third-party's application for a different mark.

33. Registrant denies the allegations of Paragraph 33. Registrant contends that "failure to function" is not a valid independent ground to deny registration.

34. Registrant denies the allegations of Paragraph 34.

WHEREFORE, Registrant prays that the Amended Petition be dismissed with prejudice.

Dated: December 15, 2020

By: /s/ John R. Sommer  
John R. Sommer

John R. Sommer  
John R. Sommer, Attorney-At-Law  
Irvine, CA 92614  
Telephone: (949) 752-5344  
Facsimile: (949) 752-5439  
[SOMMER@STUSSY.COM](mailto:SOMMER@STUSSY.COM)

Attorneys for Registrant GODISGHL, LLC

CERTIFICATE OF SERVICE

I hereby certify that, on the date of execution of this certificate, a true copy of the foregoing and attached

**REGISTRANT'S BRIEF IN OPPOSITION TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT (with Appendices)**

**DECLARATION OF JOSEPH GUINDI**

**DECLARATION OF JOHN R. SOMMER**

was served on Petitioner Elevated Faith, LLC, via email to:

Kevin Christopher  
Rockridge Venture Law  
[kevin@rockridgelaw.com](mailto:kevin@rockridgelaw.com)

Dated: December 15, 2020

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John R. Sommer