ESTTA Tracking number: **ESTTA1022199**

Filing date: **12/12/2019**

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

Proceeding	92072649
Party	Defendant Columbia Insurance Company
Correspondence Address	COLUMBIA INSURANCE COMPANY 1314 DOUGLAS STREET SUITE 1400 OMAHA, NE 681021944 UNITED STATES no email provided no phone number provided
Submission	Answer
Filer's Name	David Chen
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Signature	/David Chen/
Date	12/12/2019
Attachments	solo answer.pdf(121493 bytes)

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

AIR SKATE & AIR JUMP CORP.	:	**Cancellation No.: 92072649**
	:	**Registration No.: 3579672**
Petitioner,	:	
v.	:	**Mark:**
	:	
COLUMBIA INSURANCE COMPANY	:	
Registrant.	:	

REGISTRANT'S ANSWER

Registrant, Columbia Insurance Company, by and through its counsel hereby responds to Petitioner's Petition to Cancel as follows:

1. Registrant is without sufficient information to form a belief as to the allegations in Paragraph 1 of the Petition to Cancel, and therefore denies.

2. Registrant admits the allegations in Paragraph 2 of the Petition to Cancel.

3. Registrant admits the allegations in Paragraph 3 of the Petition to Cancel.

4. Registrant is without sufficient information to form a belief as to the allegations in Paragraph 4 of the Petition to Cancel, and therefore denies.

5. Registrant is without sufficient information to form a belief as to the allegations in Paragraph 5 of the Petition to Cancel, and therefore denies.

6. Registrant admits the allegations in Paragraph 6 of the Petition to Cancel.

7. Registrant denies the allegations in Paragraph 7 of the Petition to Cancel.

8. Registrant denies the allegations in Paragraph 8 of the Petition to Cancel.

9. Registrant incorporates by reference its responses to Paragraphs 1-8 of the Petition to Cancel.

10. Registrant denies the allegations in Paragraph 10 of the Petition to Cancel.

11. Registrant denies the allegations in Paragraph 11 of the Petition to Cancel.

12. Registrant denies the allegations in Paragraph 12 of the Petition to Cancel.

13. Registrant denies the allegations in Paragraph 13 of the Petition to Cancel.

14. Registrant incorporates by reference its responses to Paragraphs 1-13 of the Petition to Cancel.

15. Registrant denies the allegations in Paragraph 15 of the Petition to Cancel.

16. Registrant denies the allegations in Paragraph 16 of the Petition to Cancel.

17. Registrant denies the allegations made in Paragraph 17 of the Petition to Cancel.

18. Registrant denies the allegations made in Paragraph 18 of the Petition to Cancel.

19. Registrant denies the allegations made in Paragraph 19 of the Petition to Cancel.

20. Registrant denies the allegations made in Paragraph 20 of the Petition to Cancel.

21. Registrant is without sufficient information to form a belief as to the allegations in Paragraph 21 of the Petition to Cancel, and therefore denies.

AFFIRMATIVE DEFENSES

22. Petitioner's complaint fails to state a claim upon which relief can be granted.

23. Petitioner has not sustained any injury or harm and lacks standing.

WHEREFORE, Registrant prays that the cancellation proceeding be dismissed with prejudice.

Respectfully submitted,

IP ATTORNEYS GROUP, LLC

Dated: December 12, 2019

By: _____

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Attorneys for Opposer
Columbia Insurance Company

CERTIFICATE OF SERVICE

This hereby certifies that the foregoing **REGISTRANT'S ANSWER TO THE PETITION TO CANCEL** was served via email, this 12th day of December, 2019, addressed to Applicant's correspondent at the address identified in the USPTO records below:

GREGG A PARADISE

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