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

Proceeding	92074668
Party	Defendant Global Advantage Trading and Imports, L.L.C.
Correspondence Address	GLOBAL ADVANTAGE TRADING AND IMPORTS, L.L.C. 6725R CHIPPEWA STREET ST. LOUIS, MO 63109 UNITED STATES Primary Email: mhickey@lewisrice.com Secondary Email(s): mhickey@lewisrice.com No phone number provided.
Submission	Answer
Filer's Name	Michael Hickey
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Signature	/Michael J. Hickey/
Date	08/18/2020
Attachments	2020.08.18 Answer to Petition to Cancel.pdf(140802 bytes)

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

ASHLEY EDMONDS,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92074668
)	Reg. No. 6,065,177
GLOBAL ADVANTAGE TRADING)	Mark: BRU (Stylized)
AND IMPORTS, L.L.C.,)	
)	
Registrant.)	

ANSWER TO PETITION TO CANCEL

Dear Commissioner:

Registrant, Global Advantage Trading and Imports, L.L.C. (“Registrant”), responds to the below-numbered paragraphs in the Petition to Cancel of Ashley Edmonds (“Petitioner”) as follows:

1. Registrant admits that it is the owner of the registration for the stylized mark BRU, which was originally filed as Serial No. 88/239,488 and issued as Registration No. 6,065,177. Registrant also admits that it has a place of business at 6725R Chippewa Street, St. Louis, Missouri, United States 63109. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 1, and therefore denies the same.

2. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 2, and therefore denies the same.

3. Registrant is without sufficient information to form a belief as to the allegations of both paragraphs labeled Paragraph 3, and therefore denies the same. Registrant admits that an Exhibit 1 is attached to the Petition, which document speaks for itself.

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

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

6. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 6, and therefore denies the same.

7. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 7, and therefore denies the same.

8. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 8, and therefore denies the same.

9. Registrant admits the allegations of Paragraph 9. Registrant further admits an Exhibit 2 is attached to the Petition, which document speaks for itself.

10. Registrant admits that it filed an application with Serial No. 88/239,488 with the U.S. Patent and Trademark Office for the stylized mark BRU on December 21, 2018. Registrant further admits that its application published on August 20, 2019. Registrant denies the remaining allegations of Paragraph 10.

11. Registrant admits that it filed its application with Serial No. 88/239,488 for the stylized mark BRU under the Trademark Act Section 1(b). Registrant denies the remaining allegations of Paragraph 11.

12. Registrant admits that it is the owner of Registration No. 6,065,177 for the stylized mark BRU, originally filed as an application with Serial No. 88/239,488. Registrant denies the remaining allegations of Paragraph 12.

13. Registrant notes that there is no Paragraph 13 and therefore no allegations to be denied therein.

14. Registrant admits that Registration No. 6,065,177 for the stylized mark BRU includes the following goods in International Class 21: “Bottles, sold empty; sports bottles sold empty; vacuum bottles; drinking glasses, namely, tumblers; drinking glasses, namely, tumblers with lids; tumblers for use as drinking glasses; travel coffee mugs and drinking glasses, namely, tumblers with lids, made of plastic, silicone, ceramic and stainless steel; double wall cups with and double wall cups without lids; coffee cups; coffee mugs; plastic water bottles sold empty; lids for beverage storage containers, made of silicon or plastic; non-electric portable coolers and cooler bags, namely, insulated bags for food or beverages for domestic use.” Registrant denies the remaining allegations of Paragraph 14.

15. Registrant admits that it filed its application for the stylized mark BRU (which issued as Registration No. 6,065,177) with the United States Patent and Trademark Office on December 21, 2018. Registrant denies the remaining allegations of Paragraph 15.

16. Registrant admits that it filed its application for the stylized mark BRU (which issued as Registration No. 6,065,177) under the Trademark Act Section 1(b). Registrant denies the remaining allegations of Paragraph 16.

17. Registrant denies the allegations of Paragraph 17.

18. Registrant denies any allegations contained within the heading preceding Paragraph 18 (as well as any other preceding heading) and repeats and realleges each and every response set forth above.

19. Registrant is without sufficient information to form a belief as to the allegations of Paragraph 19, and therefore denies the same.

20. Registrant denies the allegations of Paragraph 20.

21. Registrant denies the allegations of Paragraph 21.

22. Registrant denies the allegations of Paragraph 22 and Petitioner's request for relief.

23. Further responding, Registrant states that Petitioner fails to state a claim upon which relief may be granted.

24. Further responding, Registrant states that Petitioner intends to rely on additional affirmative defenses that become available or apparent during discovery. Registrant therefore reserves the right to amend its Answer to assert any such additional affirmative defenses.

WHEREFORE, Registrant Global Advantage Trading and Imports, L.L.C. respectfully requests that the Petition for Cancellation be dismissed with prejudice and that registration of Registrant's mark be sustained.

Dated: August 18, 2020

Respectfully submitted,

LEWIS RICE LLC



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*Attorneys for the Registrant Global Advantage
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer to Petition to Cancel has been served this 18th day of August, 2020, via and electronic mail to Petitioner's Attorney of Record:

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