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

Proceeding	92077943
Party	Defendant Kain, William
Correspondence Address	KAIN, WILLIAM 14026 BETHANY CHURCH ROAD MONTPELIER, VA 23192 UNITED STATES Primary Email: billykain@icloud.com No phone number provided.
Submission	Answer
Filer's Name	Christopher E. Gatewood
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Signature	/Christopher E. Gatewood/
Date	10/06/2021
Attachments	Kain Answer in TTAB Cancellation 92077943 STEEPSEAT 10 2021.pdf(89531 bytes )

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

In re Registration No. 6472739  
Mark: STEEPSEAT

DAMON H. HAWKINS,  
Petitioner

v.

WILLIAM KAIN,  
Registrant.

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Proceeding No.: 92077943

**ANSWER**

Registrant William Kain, by counsel, hereby answers the Petition for Cancellation.

As an initial matter, the Petition fails to meet the standards of content and limitation of matters to be included in a Petition to Cancel. TBMP §309(a)(2). It should be rejected and dismissed. In the interests of making a complete response, however, the Registrant replies to the extent possible to each numbered portion of the Petition.

1. Paragraph 1 of the Petition is a recitation of legal conclusions. Registrant denies all allegations of this paragraph. To the extent that the matters alleged in paragraph 1 of the Petition concern registration numbers and dates, those are matters of record with the USPTO and will speak for themselves.

2. Registrant has no knowledge of the matters alleged in paragraph 2 of the Petition and therefore denies the same. To the extent that the matters alleged in paragraph 2 of the Petition concern registration numbers and dates, those are matters of record with the USPTO and will speak for themselves.

3. Registrant has no knowledge of the matters alleged in paragraph 3 of the Petition and therefore denies the same.

4. Registrant denies any factual matters that are included in the legal argument in paragraph 4 of the Petition.

5. Registrant denies any factual matters that are included in the several paragraphs and legal argument labeled as part 5 of the Petition.

6. Registrant denies any factual matters that are included in the several paragraphs and legal argument labeled as part 6 of the Petition.

7. Registrant denies the factual elements of the commentary that makes up paragraph 7 of the Petition. To the extent that the matters alleged in paragraph 7 of the Petition concern filings made with the USPTO, those are matters of record with the USPTO and will speak for themselves.

8. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 8 of the Petition.

9. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 9 of the Petition.

10. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 10 of the Petition.

11. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 11 of the Petition.

12. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 12 of the Petition.

13. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 13 of the Petition.

14. Registrant denies any factual matters that are included in the commentary and legal argument stated in part 14 of the Petition.

15. Any remaining allegations of the Petition not expressly denied in response to each numbered part of the Petition are denied by the Registrant.

Dated: October 6, 2021

Respectfully submitted,

WILLIAM KAIN

By: /s/ Christopher E. Gatewood  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that this Answer is being electronically transmitted in PDF format to the Trademark Trial and Appeal Board through the Electronic System for Trademark Trials and Appeals (ESTTA) on October 6, 2021.

/s/ Christopher E. Gatewood