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

Proceeding no.	92078240
Party	Defendant Dreams to Reality Foundation
Correspondence address	MOLLY BUCK RICHARD RICHARD LAW GROUP 13355 NOEL RD STE 1350 DALLAS, TX 75240 UNITED STATES Primary email: molly@richardlawgroup.com Secondary email(s): docket@richardlawgroup.com 214-206-4300
Submission	Answer
Filer's name	Molly Buck Richard
Filer's email	molly@richardlawgroup.com, docket@richardlawgroup.com
Signature	/Molly Buck Richard/
Date	03/22/2022
Attachments	Amended Answer.pdf(146417 bytes)

7. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 7.

8. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 8.

9. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 9.

10. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 10.

11. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 11.

12. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 12.

13. Defendant admits that it had correspondence with Plaintiff in 2016 but denies the remaining allegations contained in Paragraph 13.

14. Defendant denies the allegations contained in Paragraph 14.

Defendant further denies each and every allegation of the Petition for Cancellation not specifically admitted herein.

AFFIRMATIVE DEFENSES

1. Defendant has continuously used the mark DREAMS TO REALITY FOUNDATION long prior to any use of DREAMS TO REALITY by Plaintiff.
2. Based on Defendant's continuous use of the mark DREAMS TO REALITY prior to 2000 and continuing to date, Defendant has priority vis-à-vis Plaintiff.

WHEREFORE, Defendant Dreams to Reality Foundation requests that all of the relief requested in the Petition for Cancellation be denied and that Defendant's mark that is the subject of U.S. Trademark Registration No. 5067798 be maintained as registered.

RICHARD LAW GROUP, INC.

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*Counsel for Defendant Dreams to Reality
Foundation*

CERTIFICATE OF CONFERENCE

I hereby certify that on March 13, 2022, counsel for Plaintiff, Annette Heller, consented to the filing of this Amended Answer.

/Molly Buck Richard/

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2022, a true and complete copy of Defendant's Initial Disclosures was served upon Annette Heller, counsel for Plaintiff via email to tmattorneyheller@aol.com.

/Molly Buck Richard/