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Filing date: **11/21/2022**

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

Proceeding no.	92079034
Party	Plaintiff Peanuts Worldwide LLC
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Signature	/Jonathan D. Reichman/
Date	11/21/2022
Attachments	Peanuts Answer to Amended Counterclaim ITS THE GREAT PUMPKIN MRS BROW N.pdf(145628 bytes)

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

In the Matter of Registration No. 5,486,312

For the mark: IT'S THE GREAT PUMPKIN, MRS. BROWN

Registered: June 5, 2018

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PEANUTS WORLDWIDE LLC, :
 : **Cancellation No. 92079034**
 Petitioner, :
 :
 v. :
 :
 INTELLIGENT BLENDS, LP, :
 :
 Respondent. :
----- X

PETITIONER'S ANSWER TO RESPONDENT'S COUNTERCLAIMS

I. INTRODUCTION

Petitioner, Peanuts Worldwide LLC ("Petitioner"), by and through its undersigned counsel of record, hereby responds to the counterclaim contained in Counterclaim-Petitioner Intelligent Blends, LP's ("Respondent's") Answer, Affirmative Defenses and Counterclaim Petition. *See* TTABVUE 17 (the "Counterclaim Petition").

Petitioner bases its responses to the allegations in the Counterclaim Petition on actual knowledge of its own actions, and on information and belief with respect to all other matters. The numbered paragraphs herein correspond to the numbered paragraphs in the Counterclaim

Petition, and the original designations of “Respondent” and “Petitioner” are left undisturbed. Unless expressly admitted, all allegations in the Counterclaim Petition are hereby denied.

In response to Respondent’s numbered allegations in its counterclaim, Petitioner responds as follows:

47. Petitioner admits that the information provided above accurately reflects the contents of its Registration No. 6,048,082 for IT’S THE GREAT PUMPKIN, CHARLIE BROWN®. Petitioner lacks sufficient knowledge to respond to Counterclaim-Petitioner’s allegations with respect to Respondent’s address and form of business entity. The remaining allegations in paragraph 45 constitute conclusory legal assertions that require no response. To the extent a response is required, Petitioner denies same.

48. Petitioner lacks sufficient knowledge to admit or deny the allegations in this paragraph.

49. Paragraph 49 constitutes legal conclusions to which no response is required.

50. Paragraph 50 constitutes legal conclusions to which no response is required.

51. Denied.

PROSECUTION HISTORIES OF IT’S THE GREAT PUMPKIN, CHARLIE BROWN

52. Petitioner avers that the records of the United States Patent and Trademark Office (the “USPTO”) speak for themselves.

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63. Petitioner avers that the records of the USPTO speak for themselves.

64. Petitioner avers that the contents of the materials referred to therein speak for themselves.

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77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Denied.

82. Denied.

83. Denied.

WHEREFORE, Petitioner demands judgment dismissing and denying Respondent's Counterclaim in its entirety, with prejudice.

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

Date: November 21, 2022

/Jonathan D. Reichman/

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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this Answer is being filed through the electronic system for the Trademark Trial and Appeal Board in the United States Patent and Trademark Office on November 21, 2022.

By: /Jeremy C. King/
Jeremy C. King