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

Proceeding no.	92079586
Party	Defendant Shaharazade McConkey
Correspondence address	SHAHARAZADE MCCONKEY PO BOX 3666 OLYMPIC VALLEY, CA 96146 UNITED STATES No email provided No phone number provided
Submission	Answer
Filer's name	Walter W. Richardson
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Signature	/Walter W. Richardson/
Date	06/02/2022
Attachments	2022-06-02_92079586_Answer.pdf(21807 bytes)

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

360Sweater Company, LLC,

Petitioner,

Cancellation No. 92079586

v.

Registration No. 5613771

Shaharazade McConkey,

Registrant.

Mark: SKI NAKED

ANSWER TO PETITION FOR CANCELLATION

Registrant, Shaharazade McConkey (“Registrant”), a citizen of the United States of America with an address at P.O. Box 3666, Olympic Valley, California 96146, through her undersigned attorneys, hereby responds to the Petition for Cancellation filed by Petitioner 360Sweater Company, LLC (“Petitioner”) concerning United States Trademark Registration No. 5613771 for the mark “SKI NAKED” (the “Registration”) as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 1 of the Petition for Cancellation.
2. Paragraph 2 of the Petition for Cancellation contains legal averments which Registrant is not required to admit or deny. To the extent paragraph 2 may contain factual allegations, Registrant denies the allegations of paragraph 2 of the Petition for Cancellation.
3. Registrant denies the allegations of paragraph 3 of the Petition for Cancellation.
4. Registrant denies the allegations of paragraph 4 of the Petition for Cancellation.

DEFENSES AND RESERVATION OF COUNTERCLAIMS

5. Registrant’s SKI NAKED mark, U.S. Trademark Registration No. 5613771, has

been in continuous use in interstate commerce since no later than March 18, 2017.

6. The Petition for Cancellation fails to state a claim upon which relief can be granted.
7. Registrant avails itself of each and every defense which becomes available or is identified throughout the course of discovery.
8. Registrant avails itself of each and every counterclaim which becomes available or is identified throughout the course of discovery.

Date: June 2, 2022

Respectfully submitted,

/Walter W. Richardson/
Walter W. Richardson
WC&F IP
11491 Sunset Hills Road, Suite 340
Reston, Virginia 20190
(703) 787-9400 (voice)

Counsel for Registrant
Shaharazade McConker

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v.		Registration No. 5613771
Shaharazade McConkey,	Registrant.	Mark: SKI NAKED

CERTIFICATE OF SERVICE

I certify that on June 2, 2022, I caused a true and correct copy of the foregoing ANSWER TO PETITION FOR CANCELLATION to be delivered by email to:

Philip Nulud
BUCHALTER
A Professional Corporation
1000 Wilshire Blvd., Suite 1500
Los Angeles, California 90017
(213) 891-0700
pnulud@buchalter.com
ipdocket@buchalter.com

Date: June 2, 2022

Respectfully submitted,

/Walter W. Richardson/
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Counsel for Registrant
Shaharazade McConkey