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

Proceeding no.	92086739
Party	Defendant Sousan Arafeh
Correspondence address	SOUSAN ARAFEH 7 VICTORIA LANE OLD LYME, CT 06371 UNITED STATES No email provided Secondary email(s): sousan@researchimages.com 202-321-0676
Submission	Answer
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Date	12/24/2024
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of: Trademark Registration No. 3,310,574

For the Trademark: “For Posterity”

Goods in International Class: 9

Registered: October 16, 2007

FOR POSTERITY LIMITED,	:	
	:	Cancellation No. 92086739
Petitioner,	:	
	:	
v.	:	
	:	
SOUSAN ARAFEH,	:	Registration No. 3,310,574
	:	
Respondent.	:	

ANSWER TO PETITION FOR CANCELLATION

COMES NOW Respondent and Registrant SOUSAN ARAFEH (“Registrant”) in the above-captioned matter and submits this Answer to the Petition for Cancellation filed by FOR POSTERITY LIMITED (“Petitioner”) with respect to the mark at Registration No.: 3,310,574 (the “Registrants’ Mark”) by generally denying all of the allegations in the Petition for Cancellation, except as may be specifically admitted or denied as follows.

Regarding Petitioner’s Claim for Cancellation of the “For Posterity” Mark of U.S. Trademark Registration No. 3,310,574 on the Ground that the Mark Has Been Abandoned by the Registrant, Pursuant to 15 U.S.C. §1115(b)(2), Section 33(b)(2) of the Trademark Act

A. Regarding Claim that For Posterity Limited Has Standing to Petition for the Cancellation of U.S. Trademark Registration No. 3,310,574

1. Denied.
2. Registrant lacks knowledge or information sufficient to form a belief as to the allegations contained in Paragraph No.2 of this Petition for Cancellation and, on that basis. denies the same.
3. Admitted.
4. Respondent lacks knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 4 of this Petition for Cancellation, and they are therefore denied.

B. Regarding Claim that Respondent/Registrant Sousan Arafeh Has Abandoned the “For Posterity” Mark of U.S. Trademark Registration No. 3,310,574, Thereby Justifying Cancellation of U.S. Trademark Registration No. 3,310,574, Pursuant to 15 U.S.C. §1115(b)(2), Section 33(b)(2) of the Trademark Act

5. Registrant lacks knowledge or information sufficient to form a belief as to the allegations contained in Paragraph No.5 of this Petition for Cancellation and, on that basis. denies the same.
6. Registrant lacks knowledge or information sufficient to form a belief as to the allegations contained in Paragraph No.6 of this Petition for Cancellation and, on that basis. denies the same.
7. Registrant lacks knowledge or information sufficient to form a belief as to the allegations contained in Paragraph No.7 of this Petition for Cancellation and, on that basis. denies the same.
8. Registrant lacks knowledge or information sufficient to form a belief as to the allegations contained in Paragraph No.8 of this Petition for Cancellation and, on that basis. denies the same.

AFFIRMATIVE DEFENSE

9. As the First Affirmative Defense to the Petitioner for Cancellation, Registrant alleges that Petitioner’s standing to file this Petition for Cancellation is questionable because their claim of “owning” the “For Posterity” mark in Paragraph 1 via UK trademark applications Nos. UK00004120480, filed November 4, 2024 and UK00004120482, filed November 4, 2024 is false as these applications show a status of “examination” meaning the “For Posterity” mark has not been officially conferred.

WHEREFORE, Registrant prays that this Petition for Cancellation be denied and that the Registrant’s Mark be allowed to continue to be registered and maintained on the Principal Register.

I hereby certify that a true and complete copy of the foregoing ANSWER TO PETITION FOR CANCELLATION has been served on FOR POSTERITY LIMITED by forwarding said copy on December 24, 2024 via email to: EDWIN D. SCHINDLER, 12944 PARROT POND ROAD, BOYNTON BEACH, FL 33473.

EDSchindler@att.net

EDSchindler@optonline.net

EdwinSchindler@gmail.com

Signature /Sousan Arafeh/

Date December 24,2024

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