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Filing date: **03/18/2016**

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

| | |
|------------------------|---|
| Proceeding | 92063123 |
| Party | Defendant Triple B Construction Inc. |
| Correspondence Address | TRIPLE B CONSTRUCTION INC 208 C SOUTHWEST PARKWAY EAST COLLEGE STATION, TX 77840 UNITED STATES |
| Submission | Answer |
| Filer's Name | Bryan T. Hanna |
| Filer's e-mail | bryan.hanna@westwebblaw.com |
| Signature | /Bryan T. Hanna/ |
| Date | 03/18/2016 |
| Attachments | Defendant's Answer to Petition for Cancellation.pdf(219530 bytes) Ltr Answer.pdf(77191 bytes) |

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

VARTAN KHAZADIAN,

Plaintiff,

vs.

TRIPLE B CONSTRUCTION INC.,

Defendant.

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CANCELLATION NO. 92063123
REGISTRATION NO. 3238468

Mark: HANDI HOOK

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

TRIPLE B CONSTRUCTION, INC. hereby responds to the Petition for Cancellation for Trademark Registration #3238468 (the "Petition") with the following numbered paragraphs which correspond to the paragraph numbers in the Petition.

1. Triple B Construction Inc. denies that Plaintiff is entitled to the relief sought in the Petition. Triple B Construction Inc. admits that it is the owner of the trademark for "Handi Hook." Triple B Construction Inc. is without sufficient information to form a belief as to the truth of the allegations contained in the remainder of Paragraph 1 and therefore denies the allegations contained therein.

2. Triple B Construction Inc. admits it provided a specimen to the Commissioner of Trademarks on March 16, 2013. Triple B Construction Inc. admits that the registration of its trademark was continued. Triple B Construction Inc. is without sufficient information to form a belief as to the truth of the allegations contained in the remainder of Paragraph 2 and therefore denies the allegations contained therein.

3. Triple B Construction Inc. is without sufficient information to form a belief as to the truth of the allegations contained in the remainder of Paragraph 3 and therefore denies the allegations contained therein.

4. Triple B Construction Inc. is without sufficient information to form a belief as to the truth of the allegations contained in the remainder of Paragraph 4 and therefore denies the allegations contained therein.

5. Triple B Construction Inc. is without sufficient information to form a belief as to the truth of the allegations contained in the remainder of Paragraph 5 and therefore denies the allegations contained therein.

PRAYER FOR RELIEF

WHEREFORE, Defendant Triple B Construction, Inc. respectfully requests that Plaintiff's Petition for Cancellation of Trademark Registration #3238468 be dismissed and award such other relief, at law or in equity, as may be necessary and appropriate and to which Triple B Construction, Inc. has shown itself to be justly entitled.

Respectfully submitted,

WEST, WEBB, ALLBRITTON & GENTRY, P.C.

By: /Bryan T. Hanna/

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Defendant's Original Answer has been served on Vartan Khazadian by mailing said copy on March 18, 2016, via First Class Mail, postage prepaid and certified mail, return receipt requested to:

Vartan Khazadian
P.O. Box 135
Bethel, CT 06801

Via First Class Mail and CM/RRR

/Bryan T. Hanna/

WEST, WEBB, ALLBRITTON & GENTRY
A PROFESSIONAL CORPORATION

— Established in 1982 —

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March 18, 2016

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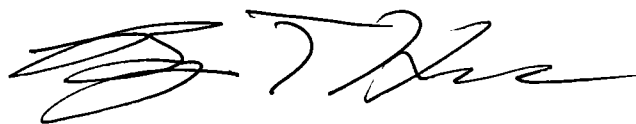
**Via Regular First Class Mail, Postage Prepaid and
Via CM/RRR# 7015 0640 0002 6212 5025**

Vartan Khazadian
P.O. Box 135
Bethel, CT 06801

Re: Defendant's Answer to Cancellation Petition

Enclosed please find the Defendant's Answer to the Petition for Cancellation of
Registration No. 3238468 (Cancellation No. 92063123) filed with the USPTO Trademark Trial
and Appeal Board.

Sincerely,



Bryan T. Hanna

Enclosure