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

Proceeding	92074406
Party	Defendant Karen Dreyfuss
Correspondence Address	KAREN DREYFUSS 21126 BIRDS NEST TERRACE BOCA RATON, FL 33433 UNITED STATES Primary Email: siviadreyfuss@gmail.com 786-624-0429
Submission	Answer
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Date	07/15/2020
Attachments	Answer_92074406.pdf(28475 bytes) EXHIBIT A.pdf(831434 bytes)

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

BOSTWICK BRANDS, Petitioner v. KAREN DREYFUSS, Respondent	Cancellation No.: 92074406 Mark: PURE WONDER Registration No.: 5,181 ,849 Registered: April 11, 2017
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ANSWER

Respondent Karen Dreyfuss resides at 3980 Curtis Circle, Boca Rotan, Florida, 33434 (“Respondent”) and is the owner of U.S. Registration No. 5,181,849 for the mark PURE WONDER (the “Registered Mark”). Owner has received a Notice to respond to the PETITION FOR CANCELLATION filed on June 5, 2020 (the “Petition”) by Petitioner Bostwick Brands, LLC (“Petitioner”). In response to the Petition, Respondent responds as follows:

1. Respondent filed an application for the Registered Mark on June 23, 2013. At that time, owner was developing bottled water that harnessed new technology that generates safe drinking water from air.

2. Petitioner alleges that Respondent has abandoned the Registered Mark pursuant to Section 14(3) of the Trademark Act, 15 U.S.C. § 1064(3). Respondent denies this allegation.

3. Petitioner alleges that Respondent is not currently using the Registered Mark in connection with “bottled drinking water; bottled water.” Respondent denies this allegation.

4. Petitioner alleges that Respondent has discontinued use of the Registered Mark in connection with the goods identified in Respondent’s Registration, and has no plans to resume use. Respondent denies this allegation.

5. Petitioner alleges that Respondent has not use the Registered Mark for the at least the last three (3) consecutive years. Respondent denies this allegation.

6. Respondent contacted suppliers and retailers and Respondent had water bottles using the Registered Mark at Apura Juicery & Coffeehouse, located at 22191 Powerline Road Suite 20B, Boca Raton, Florida, 33433, in February of 2017. In September of 2017, Apura Juicery & Coffeehouse closed.

7. In October of 2017, bottles having the Registered Mark were at the Dosha Café, located at 139 NE 1st Avenue, Hallandale Beach, Florida, 33009. Bottles using the registered mark were available at Dosha Café until March of 2020 when the restaurant closed due to the COVID 19 virus pandemic. See Exhibit A for specimens showing use of the Registered Mark at Dosha Café.

8. A new restaurant Vegan Junkie opened in July of 2020 at the Dosha Café location and has agreed to have water bottles using the Registered Mark. Newly designed one-gallon bottles were ordered on July 10, 2020 and will be delivered to Vegan Junkie as soon as the bottles are received from the Respondent's supplier. See Exhibit B for a mockup of the newly designed one-gallon bottle that is currently under production.

9. Respondent is currently negotiating with ENV Technologies and Mission Possible Foundation, to produce PURE WONDER branded bottled water.

10. As Respondent has obtained the Registered Mark, used the Registered Mark in the last three last years, and has plans to increase the use of the Registered Mark, Respondent has not abandoned the Registered Mark and believes that U.S. Registration No. 5,181,849 remains valid and requests early dismissal of the Petition for Cancellation.

Respondent reserves the right to amend this Answer in the event discovery of other information as appropriate.

WHEREFORE, Respondent prays that U.S. Registration No. 5,181,849 remain valid and the Petition for Cancellation be dismissed.

Respectfully submitted,

ASCENTAGE LAW, LLC

DATED: July 15, 2020

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Certificate of Service

I hereby certify that a true and complete copy of the foregoing ANSWER has been served on Charlene Minx by forwarding said copy on July 15, 2020, via email to: Charlene Minx at charlene@minxlaw.com.

Signature /Craig Hallacher/

Date July, 15, 2020

EXHIBIT A





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