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

In the Matter of Application Serial No. 76/021,469
Published in the Official Gazette on October 2, 2001
Mark: WASHINGTON PIGSKINS

U.S. Patent & TMOfc/TM Mail Rcpt. Dt. #57
08-30-2002

PRO-FOOTBALL, INC. AND NFL PROPERTIES, LLC, Opposers, - against - DAVID S. CAMPBELL, Applicant.	Opposition No. 91152156 **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

TO THE ASSISTANT COMMISSIONER FOR TRADEMARKS:

COMES NOW Applicant, David S. Campbell, *Pro Se,* and for his Answer to the Notice of opposition filed herein, states as follows:

1. Applicant admits the allegations contained in Paragraph 1.
2. Applicant is without sufficient information on which to admit or deny the allegations contained in Paragraph 2, and therefore denies the same.
3. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 3, and therefore denies the same.
4. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 4, and therefore denies the same.
5. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 5, and therefore denies the same.
6. Applicant is without sufficient information to admit or deny the allegations contained

in Paragraph 6, and therefore denies the same.

7. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 7, and therefore denies the same.

8. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 8, and therefore denies the same.

9. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 9, and therefore denies the same.

10. Applicant denies the allegations contained in Paragraph 10.

11. Applicant denies the allegations contained in Paragraph 11.

12. Applicant denies the allegations contained in Paragraph 12.

13. Applicant is without sufficient information to admit or deny the allegations contained in Paragraph 13, and therefore denies the same.

14. Applicant admit the allegations contained in Paragraph 14.

15. As to Paragraph 15, Applicant admits filing this Application on April 10, 2000, but denies the remaining portions of Paragraph 15.

16. Applicant denies the allegations contained in Paragraph 16.

17. Applicant denies the allegations contained in Paragraph 17.

18. Applicant denies the allegations contained in Paragraph 18.

19. Applicant denies the allegations contained in Paragraph 19.

20. Applicant denies the allegations contained in Paragraph 20.

21. Applicant denies the allegations contained in Paragraph 21.

AFFIRMATIVE DEFENSES

1. Opposers fail to state a claim upon which relief can be granted.

2. Opposers are barred from bringing this action by the doctrines of waiver, laches,

estoppel and unclean hands.

3. This application presents no likelihood of confusion, because great efforts were made to distance this mark from any confusion with a mark so disparaging to Native Americans as the "Washington Redskins".

4. The team name "Washington Redskins" has been determined by a three judge panel of the U.S. Patent and Trademark Office to be disparaging and constituting an impermissible violation of the Lanham Act. The Opposers have appealed this determination.

5. Applicant's mark does not purport to characterize an ethnic group of humans, but rather uses a colloquial term for a football, to wit, a pigskin.

6. Applicant's application is limited to two international classifications, and Applicant does not purport to own or run a football team.

WHEREFORE, having fully answered, Applicant respectfully requests that the U.S. Patent and Trademark Office, Trademark Trial and Appeal Board deny this opposition and permit the registration of Washington Pigskins, for costs of this action, and for such other and further relief as the Board deems appropriate in the circumstances.

Respectfully submitted,

By: _____

David S. Campbell, Attorney Pro Se
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CERTIFICATE OF MAILING BY "EXPRESS MAIL"

"Express Mail" mailing number EU223630230US
I hereby certify that this document and instructions for payment of fee is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service in an envelope addressed to the Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3513 on this 29th day of August, 2002.

Signature_____
David S. Campbell

Vogel Campbell Blueher & Castle, P.C.

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August 29, 2002

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Re: In re Application of David S. Campbell: WASHINGTON PIGSKINS, Serial No. 76/021469

To the Assistant Commissioner:

I enclose the original and one copy of the Applicant's Answer to Notice of Opposition in the above-referenced application. Your attention to this matter is appreciated.

Sincerely,

VOGEL CAMPBELL & BLUEHER, P.C.

David S. Campbell

DSC:lag
Enclosure

cc: Lawrence A. Weinstein, Esq.
Ray Regan, Esq.