

BHAGWAN traveled throughout India giving talks, engaging attendees in public debate, and introducing his revolutionary active meditation technique.

2. Denies the allegations contained in paragraph 2 of the Notice of Opposition, except admits that in 1974, BHAGWAN moved from Bombay to Pune, India, where he established an Ashram ("*place of learning*") dedicated to meditation and self-discovery.

3. Denies the allegations contained in paragraph 3 of the Notice of Opposition, except admits that in or about 1962, BHAGWAN started to conduct guided meditations at the ends of his talks and, thus, that the first Meditation Centers and Meditation Camps started to emerge around his teachings.

4. Denies the allegations contained in paragraph 4 of the Notice of Opposition, except admits that between 1981 and 1985, BHAGWAN and some of his followers lived in the high desert of eastern Oregon, on a 126-square-mile former cattle ranch organized as a commune.

5. Denies the allegations contained in paragraph 5 of the Notice of Opposition, except admits that between 1985 and 1986, BHAGWAN went on a world tour to meet his followers around the world, spending the last five months of 1986 in Bombay and returning to Pune, India, on January 4, 1987. Applicant further admits that,

at that time, BHAGWAN was an individual well known for his unique active meditation technique and related books.

6. Denies the allegations contained in paragraph 6 of the Notice of Opposition, except admits that in 1989, BHAGWAN adopted the name "Osho," derived from the expression "*oceanic experience*" by William James.

7. Denies the allegations contained in paragraph 7 of the Notice of Opposition.

8. Denies the allegations contained in paragraph 8 of the Notice of Opposition, except admits that BHAGWAN died on January 19, 1990.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Notice of Opposition, except admits that it owns all copyrights and other proprietary rights to the works of authorship of BHAGWAN, as well as the exclusive right to register and use all trademarks and service marks consisting of or incorporating the mark OSHO to identify those copyrighted works and Applicant as their genuine non-infringing source.

10. Admits the allegations contained in paragraph 10 of the Notice of Opposition.

11. Denies the allegations contained in paragraph 11 of the Notice of Opposition.

12. Denies the allegations contained in paragraph 12 of the Notice of Opposition.

13. Denies the allegations contained in paragraph 13 of the Notice of Opposition.

14. In response to paragraph 14 of the Notice of Opposition, Applicant repeats and realleges its responses to paragraphs 1 through 13 of the Notice of Opposition, as if each were fully set forth herein.

15. Denies the allegations contained in paragraph 15 of the Notice of Opposition.

16. Denies the allegations contained in paragraph 16 of the Notice of Opposition.

17. Denies the allegations contained in paragraph 17 of the Notice of Opposition.

18. Denies the allegations contained in paragraph 18 of the Notice of Opposition.

19. Denies the allegations contained in paragraph 19 of the Notice of Opposition.

20. In response to paragraph 20 of the Notice of Opposition, Applicant repeats and realleges its responses to paragraphs 1 through 19 of the Notice of Opposition, as if each were fully set forth herein.

21. Denies the allegations contained in paragraph 21 of the Notice of Opposition.

22. Denies the allegations contained in paragraph 22 of the Notice of Opposition.

AFFIRMATIVE DEFENSE

FIRST AFFIRMATIVE DEFENSE

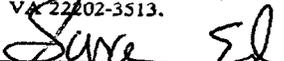
23. The Notice of Opposition fails to state a claim, in whole or in part, upon which relief can be granted.

WHEREFORE, Applicant respectfully requests that Opposition No. 91152313 be dismissed with prejudice, that application Serial No. 76/060676 proceed to registration, that judgment be entered for Applicant and for such other and further relief as the Board deems just and proper.

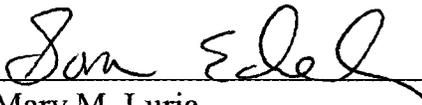
Dated: September 12, 2002
New York, New York

CERTIFICATE OF EXPRESS MAIL

Date of Deposit: 9/13/02
"Express Mail" Mailing Label No.: EV174590126 US
I hereby certify that this correspondence is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 CFR 1.10 on the date indicated above and is addressed to the Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513.


Sara Edelman

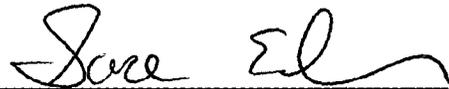
DAVIS & GILBERT LLP

By: 
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Sara Edelman

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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer was served by first-class mail, postage pre-paid, on Gina L. Durham, Esq, Piper Marbury Rudnick & Wolfe, 203 North LaSalle Street, Suite 1800, Chicago, Illinois 60601-1293, Attorneys for Opposer on September 13, 2002.

A handwritten signature in cursive script, appearing to read "Sara Edelman", written over a horizontal line.

Sara Edelman