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

Proceeding	91164009
Party	Defendant Rubber King Tyres India Pvt. Ltd. Rubber King Tyres India Pvt. Ltd. 103, Naindhara Apartment Nr. GNFC Info Tower; INX Ahmedabad, 380054
Correspondence Address	JOHN ALUMIT LAW OFFICES OF ALEX D. PATEL 20121 VENTURA BOULEVARD, SUITE 302 WOODLAND HILLS, CA 91364-2559
Submission	Answer
Filer's Name	John Alumit
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Date	03/08/2005
Attachments	TTAB_Answer_RUBBER KING.pdf (2 pages)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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BFS Brands, LLC)	
)	
And)	
)	
Bridgestone/Firestone)	
North American Tire, LLC,)	Opposition No. 91164009
)	
v.)	Serial No. 78/347864
)	
Rubber King Tyres India Pvt. Ltd.)	
)	
Applicant.)	

APPLICANT'S ANSWER TO OPPOSITION

Applicant, Rubber King Tyres India Pvt. Ltd., by its attorney, hereby answers the allegations set forth in the Notice of Opposition as follows:

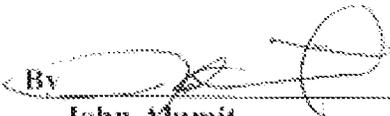
1. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 1 of the Notice of Opposition, and, therefore, denies said allegations.
2. Admitted in part; Applicant seeks to register the words RUBBER KING in combination with its design logo, not solely as a word mark.
3. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 3 of the Notice of Opposition, and, therefore, denies said allegations.
4. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 4 of the Notice of Opposition, and, therefore, denies said allegations.
5. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 5 of the Notice of Opposition, and, therefore, denies said allegations.
6. Denied. Applicant's mark with or without the design bears no resemblance to Opposer's mark, in sound, appearance, or connotation. The wording

"RUBBER" and "ROAD" bear two distinctly different connotations, sounds, and appearances. The addition of Applicant's design makes the distinctions between the two marks even greater.

7. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 7 of the Notice of Opposition, and, therefore, denies said allegations.
8. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in paragraph 8 of the Notice of Opposition, and, therefore, denies said allegations.
9. Denied. Opposer does not claim exclusive rights to the common wording KING in connection with any of the goods identified by either party, nor does it allege to own any other mark bearing the wording KING in connection with these goods to create an association solely with this word.
10. Denied.
11. Denied.

WHEREFORE, Applicant prays that the present opposition be granted in favor of Applicant, this opposition be dismissed, and that registration be granted.

Rubber King Tyres India Pvt. Ltd.

By 
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Attorney for Applicant

PROOF OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT'S ANSWER TO OPPOSITION has been served on Peter Mack, counsel for Opposer, by mailing said copy on February 8, 2005, via First Class Mail, postage prepaid to: Peter Mack, Foley & Lardner LLP, Washington Harbour, 3000 K Street, N.W., Suite 500, Washington, D.C. 20007.


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