

TTAB

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

Allied Domecq International Holdings BV

Opposer,

v.

Vodka Slavianskaya Limited,

Applicant

In Re:

Serial No.: 78/479,590
Filed: September 7, 2004
Published: September 20, 2005
Mark: SLAVIANSKAYA
SPIRIT OF RUSSIA

Opposition No.: 91168659

Box TTAB
NO FEE
Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Dear Sir:

TRANSMITTAL

Enclosed herewith please find the Answer to the Notice of Opposition, with the Certificate of Service, for the above-referenced matter.

Please charge any deficiencies to our deposit account 23-3050.

Respectfully submitted,

Date: May 18, 2006


Denise I. Mroz
trademarks@woodcock.com

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One Liberty Place, 46th Floor
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Date of Deposit: May 18, 2006



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address and therefore denies the same. Applicant denies the remaining allegations of the preamble.

1. Applicant admits the allegations of Paragraph 1.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 2 and, therefore, denies the same and demands strict proof thereof.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 3 and, therefore, denies the same and demands strict proof thereof.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 4 and, therefore, denies the same and demands strict proof thereof.

5. Applicant denies each and every averment of Paragraph 5.

6. Applicant admits that a U.S. trademark registration is entitled to certain legal presumptions. Except as so admitted, Applicant denies each and every averment of Paragraph 6.

7. Applicant denies each and every averment of Paragraph 7.

8. Applicant is without knowledge or information sufficient for form a belief as to the truth of the averments of Paragraph 8 and therefore denies the same and demands strict proof thereof.

9. Applicant denies each and every averment of Paragraph 9.

10. Applicant denies each and every averment of Paragraph 10.

AFFIRMATIVE DEFENSES

By way of further Answer, Applicant alleges the following affirmative defenses:

11. There is no likelihood of confusion, mistake, or deception because, *inter alia*, Applicant's mark is not confusingly similar to the pleaded marks of Opposer.
12. Opposer's pleaded marks are not distinctive.
13. The purchasers and/or potential purchasers of Opposer's and Applicant's goods are sophisticated and know with whom they are dealing.

WHEREFORE, Applicant requests that the opposition be dismissed and that Serial No. 78/479,590 be allowed to register.

Respectfully submitted,

Date: May 18, 2006



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Attorneys for Applicant

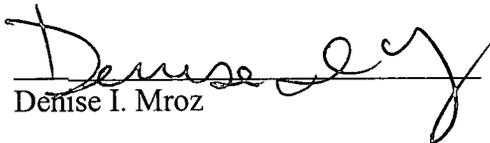
CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing document was mailed on May 18, 2006, via Express Mail, postage prepaid, to counsel for Opposer:

Edward T. Colbert
William M. Merone
Kenyon & Kenyon LLP
1500 K Street NW, Suite 700
Washington, DC 20005

and by Express Mail to:

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451
BOX TTAB – NO FEE


Denise I. Mroz