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ATTORNEYS AT LAW

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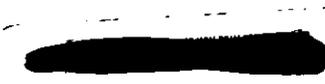
225 South Sixth Street, Suite 4000
Minneapolis, Minnesota 55402-4690
Telephone 612 339 7121
Facsimile 612 339 5897
www.bestlaw.com



June 30, 2006

**POST OFFICE EXPRESS
TO ADDRESSEE**

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451



06-30-2006

U.S. Patent & TMO/CTM Mail Recd. Dt. #11

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RE: Answer to Notice of Opposition #91171205
SAFILO – Societa Azionaria Fabbrica Italiana Lavorazione
Occhiali S.P.A. v. Riedell Shoes, Inc. –
(USPTO Serial No.: 76/628,448 - CarreraTM roller skate boots)

Dear Sir/Madam:

Enclosed for filing please find Applicant Riedell Shoes, Inc.'s Answer to the Notice of Opposition in the above-captioned matter.

Sincerely,

David J. Zubke

Enclosure

cc: Robert Riegelman, President
Danielle I. Mattessich
John A. Clifford

000147/250001/453006_1

OF COUNSEL
John R. Carroll
Robert L. Crosby
Richard A. Peterson
Judith A. Rogosheske
Scott P. Moen

FOUNDED 1926

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

SAFILO – Societa Azionaria Fabbrica
Italiana Lavorazione Occhiali S.P.A.

Opposer,

Opposition No. 91161205

v.

Riedell Shoes, Inc.



Applicant.

06-30-2006

U.S. Patent & TMO/TM Mail Rpt. Dt. #11

ANSWER TO NOTICE OF OPPOSITION

Applicant, Riedell Shoes, Inc., answers Opposer's Notice of Opposition as follows:

Applicant denies each and every matter, thing, and allegation in Opposer's Notice, except as may be hereafter admitted. Applicant responds as follows to the numbered paragraphs of Opposer's Notice, the paragraph numbers herein corresponding to those contained in the Notice:

1. Admits.
2. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in this paragraph and therefore denies the same.
3. Denies.
4. Denies.
5. Denies.
6. Denies.
7. Denies

AFFIRMATIVE DEFENSES

8. The Notice of Opposition fails to state any claim upon which relief can be granted.

9. Applicant's pending trademark, Serial No. 76/628,448, is not confusingly similar to any registered trademark of the Opposer, therefore, there is no likelihood of confusion actionable under 15 U.S.C. Sec. 1052(d).

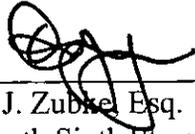
10. The goods recited in Applicant's application Serial No. 76/628,448 for its mark in class 28 are unrelated to and distinguishable from the goods associated with Opposer's marks. Therefore, there is no likelihood of confusion under 15 U.S.C. Sec. 1052(d).

11. The word "Carrera" is widely used by many different parties for a range of goods and services, and has been widely registered by the United States Patent and Trademark Office. As a result, any rights to which Opposer's alleged marks might be entitled are sufficiently restricted in scope as to goods and the nature of the mark that Applicant's mark is not confusingly similar to Opposer's mark, and no relevant, reasonable consumer would be confused into thinking that Applicant's mark identifies any mark of the Opposer, or that Applicant's roller skate boots are authorized, sponsored or endorsed by Opposer.

12. Wherefore, Applicant respectfully requests that the Notice of Opposition be dismissed and denied, with prejudice, and that the application Serial No. 76/628,448 be allowed to proceed to registration.

Dated: Minneapolis, MN
June 30, 2006

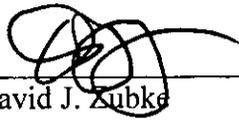
Respectfully submitted,
BEST & FLANAGAN LLP
Attorney for Applicant

By: 
David J. Zubke Esq.
225 South Sixth Street #4000
Minneapolis, MN 55402-4690
(612) 339-7121

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's Answer to Opposer's Notice of Opposition is being mailed via first class mail, postage pre-paid, on this 30th day of June, 2006 to:

Danielle I. Mattessich
John A. Clifford
Merchant & Gould
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2215



David J. Zubke
Attorney for Applicant
Riedell Shoes, Inc.

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