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

Proceeding	91171562
Party	Defendant Crysteel Manufacturing, Inc. Crysteel Manufacturing, Inc. 52182 Ember Road Lake Crystal, MN 560550178
Correspondence Address	GEOFFREY R. MYERS HALL, MYERS, VANDE SANDE & PEQUIGNOT 10220 RIVER RD STE 200 POTOMAC, MD 20854-4932 jwwalworthjr@jonesday.com, pcyngier@jonesday.com
Submission	Answer
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Signature	/James W. Walworth Jr./
Date	12/20/2006
Attachments	Applicant's Answer to Notice of Opposition.pdf (4 pages)(84163 bytes)

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

In the Matter of Opposition No. 91171562
Concerning Trademark Application Serial No. 76/634403

FORD MOTOR COMPANY	)
	)
Opposer	)
	)
v.	)
	)
CRYSTEEL MANUFACTURING, INC.	)
	)
Applicant	)

Commissioner for Trademarks
BOX TTAB
P.O. Box 1450
Alexandria, Virginia 22313-1451

ANSWER TO NOTICE OF OPPOSITION

Sir or Madam:

Applicant, Crysteel Manufacturing , Inc., ("Crysteel"), by and through its undersigned counsel, hereby responds to the Notice of Opposition in this matter as follows:

1. Crysteel denies the allegations set for in the unnumbered paragraph immediately preceding Paragraph 1 of the Notice of Opposition.

2. Crysteel admits the allegations set forth in Paragraph 1 of the Notice of Opposition.

3. Crysteel has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 2 of the Notice of Opposition, and, therefore, denies the allegations.

4. Crysteel 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 the allegations.

5. Crysteel 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 the allegations.

6. Crysteel 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 the allegations.

7. Crysteel has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 6 of the Notice of Opposition, and, therefore, denies the allegations.

8. Crysteel 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 the allegations.

9. Crysteel 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 the allegations.

10. Crysteel has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 9 of the Notice of Opposition, and, therefore, denies the allegations.

11. Crysteel has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 10 of the Notice of Opposition, and, therefore, denies the allegations.

12. Crysteel has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 11 of the Notice of Opposition, and, therefore, denies the allegations.

13. Crysteel admits the allegations set forth in Paragraph 12 of the Notice of Opposition.

Crysteel denies the allegations contained in the unnumbered paragraph immediately following Paragraph 12 of the Notice of Opposition and specifically denies that Opposer is entitled to any relief in this matter, whatsoever.

FIRST AFFIRMATIVE DEFENSE

Opposer fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Opposer's Notice of Opposition is precluded by the equitable doctrine of laches.

THIRD AFFIRMATIVE DEFENSE

Opposer's Notice of Opposition is precluded by the equitable doctrines of estoppel and waiver.

Respectfully submitted,

Timothy P. Fraelich
James W. Walworth, Jr.
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114

Attorneys for Applicant
Crysteel Manufacturing, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer to Notice of Opposition was served on this 20th day of December, 2006, via regular mail upon:

Elizabeth F. Janda
Brooks Kushman, P.C.
1000 Town Center, Suite 2000
Southfield, Michigan 48075

Attorney for Applicant
Crysteel Manufacturing Inc.