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Filing date: **10/12/2007**

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

Proceeding	91179293
Party	Defendant Bobbi Panter, LLC
Correspondence Address	ALAN B. SAMLAN KNECHTEL, DEMEUR & SAMLAN 525 W MONROE ST STE 2360 CHICAGO, IL 60661-3629 UNITED STATES
Submission	Answer
Filer's Name	Alan B. Samlan
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Signature	/Alan B. Samlan/
Date	10/12/2007
Attachments	AnswerandAffirmativeDefenses.pdf (3 pages)(156156 bytes)

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

REVLON CONSUMER PRODUCTS CORPORATION,	:	
	:	
Opposer,	:	
	:	Serial No.: 77/038766
v.	:	Opposition No.: 91179293
	:	
BOBBI PANTER, LLC,	:	
	:	
Applicant.	:	

ANSWER AND AFFIRMATIVE DEFENSES

U.S. Patent and Trademark Office
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria VA, 22313-1451

Applicant, Bobbi Panter, LLC (“Panter”) by and through its undersigned attorneys, hereby responds to the like numbered paragraphs of the Opposer, Revlon Consumer Products Corporation, (“Revlon”) Notice of Opposition as follows:

1. Admitted.
2. Admitted, except that the principal office is located at 643 W. Grand Avenue, Chicago, IL 60610.
3. Panter acknowledges the existence of the CHARLIE Registration Nos. 1,001,330 and 1,638,832. Panter is without knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations of Paragraph 3, and therefore denies the same.
4. Panter acknowledges the existence of U.S. Registration Nos. 981,697 for the CHARLIE logo, Registration No. 1,984,728 for the trademark CHARLIE WHITE, Registration No. 2,167,732 for the trademark CHARLIE RED and Registration No. 2,168,661 for the trademark CHARLIE SUNSHINE. Panter is without knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations of paragraph 4, and therefore denies the same.

5. Panter is without knowledge or information sufficient to form a belief as the truth or falsity of the allegations in Paragraph 5, and therefore denies the same.

6. Panter repeats and realleges the answers given to Paragraphs 1 through 5 above as if fully set forth herein.

7. Denied.

8. Denied.

9. Denied.

AFFIRMATIVE DEFENSES

Panter alleges the following Affirmative Defenses, without assuming the burden of proof on such defenses that would otherwise rest with Revlon:

1. There is no likelihood of confusion with respect to the use of the parties respective marks.
2. Revlon's Notice of Opposition fails to state a claim upon which relief may be granted.
3. Panter reserves the right to assert additional affirmative defenses learned in discovery or otherwise.

In conclusion, Panter respectfully requests that this Opposition proceeding be dismissed and that its registration issue forthwith.

Respectfully submitted,

BOBBI PANTER, LLC

Dated: October 12, 2007

Alan B. Samlan
David J. Hurley
KNECHTEL, DEMEUR & SAMLAN
525 W. Monroe St., Suite 2360
Chicago, IL 60661
312-655-9900

By: 
Attorneys for Applicant

CERTIFICATE OF TRANSMITTAL

I hereby certify that this correspondence is being electronically transmitted in PDF format to the Trademark Trial and Appeal Board through the Electronic System for Trademark Trials and Appeals (ESTTA) on the following date:

Date: October 12, 2007


Alan B. Samlan

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer and Affirmative Defenses has been served on Revlon Consumer Products Corporation by mailing said copy, via First Class Mail, postage prepaid to: John N. O'Shea, Revlon Consumer Products Corporation, 237 Park Avenue, New York, NY 10017.

Date: October 12, 2007


Alan B. Samlan