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

Proceeding	91181975
Party	Defendant Goldstar Holdings Corp
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TRADEMARK TRIAL AND APPEAL BOARD  
UNITED STATES PATENT AND TRADEMARK OFFICE

Joanna Villeneuve and  
Melanie Villeneuve,  
plaintiffs and opposers

v.

Goldstar Holdings Corp.,  
defendant and applicant

Opposition number 91181975

Application number 79030057

ANSWER

Defendant Goldstar Holdings Corp., for its Answer to the above-captioned Opposition, states as follows regarding the numbered paragraphs thereof:

1. As regards paragraph 1, it is admitted that the late Gilles Villeneuve left a widow named Joanna Villeneuve, and left a daughter named Melanie Villeneuve. It is further admitted that the late Gilles Villeneuve was a famous Canadian race car driver who died in 1982. Applicant otherwise denies knowledge sufficient to form a belief as to the truth or falsity of the remaining allegations of this paragraph.
2. As regards paragraph 2, it is admitted that Goldstar Holdings Corp. (hereinafter "Goldstar") is a Bahamian company. It is further admitted that Goldstar has, in particular times in the past, been engaged primarily in managing the business affairs of Jacques Villeneuve. The allegations are otherwise denied.
3. As regards paragraph 3, on information and belief the allegation that the widow of the late Gilles Villeneuve was an heir and beneficiary of the estate of Gilles Villeneuve, and as such succeeded to his interests in all his assets, including the trademark rights in his name, is denied. It is also admitted that Jacques Villeneuve is also an heir and beneficiary of the Estate of Gilles Villeneuve. Applicant otherwise denies knowledge sufficient to form a belief as to the truth or falsity of the remaining allegations of this paragraph.
4. As regards paragraph 4, Goldstar states that as a Formula One race car driver, Gilles Villeneuve had

only six wins with two of them being in the United States in 1979. Goldstar further states that Gilles Villeneuve won numerous races in the United States in the 1970's and early 1980's by participating in the Formula Atlantic Circuit. The allegations of paragraph 4 are otherwise denied, upon information and belief.

5. As regards paragraph 5, Goldstar states that Gilles Villeneuve was well known in the 1970's and early 1980's in the United States, when he participated in the Formula Atlantic races. Goldstar further states that on information and belief, at present, there is not significant fame and goodwill associated with the name Gilles Villeneuve in the United States. Goldstar objects to the allegations of paragraph 5 insofar as they allege as to matters outside of the U.S. Goldstar otherwise denies the allegations of paragraph 5.

6. As regards paragraph 6, Goldstar admits that on December 14, 2005, Applicant filed an international trademark application which matured into international trademark registration number 0901438, one designation of which became the present US trademark application number 79030057. As for the goods identified in the US trademark application, the document speaks for itself. Applicant otherwise denies knowledge sufficient to form a belief as to the truth or falsity of the remaining allegations of this paragraph.

7. Goldstar denies the allegations of paragraph 7.

8. Goldstar denies the allegations of paragraph 8.

9. As regards paragraph 9, Applicant denies knowledge sufficient to form a belief as to the truth or falsity of the allegations of that paragraph.

  
\_\_\_\_\_  
Goldstar Holdings Corp.

*NICHOLAS BARTMAN*  
\_\_\_\_\_  
printed name of signer

*ATTORNEY*  
\_\_\_\_\_  
title  
*20 APRIL 2010*  
\_\_\_\_\_  
date signed