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

Proceeding	91184529
Party	Defendant Global Tissue Group, Inc.
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Date	07/10/2009
Attachments	Resp Mo for L to A.pdf (3 pages)(44196 bytes)

**BEFORE THE UNITED STATES
TRADEMARK TRIAL AND APPEAL BOARD**

GEORGIA-PACIFIC CONSUMER
PRODUCTS LP,

Opposer,

v.

GLOBAL TISSUE GROUP, INC.,

Applicant.

Opp. No. 91184529
Serial No. 77/364616

**APPLICANT'S BRIEF IN RESPONSE TO OPPOSER'S
MOTION FOR LEAVE TO AMEND NOTICE OF OPPOSITION**

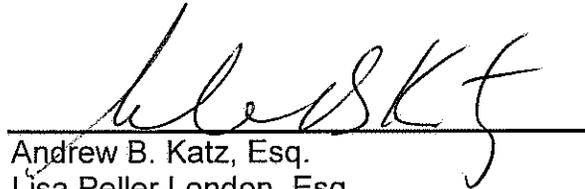
Applicant, by and through its counsel, hereby timely files its brief in response to Opposer's Motion for Leave to Amend its Notice of Opposition.

Applicant consents to Opposer's request to amend its Notice Of Opposition.¹ It should be specifically understood that concurrent with Applicant's consent to Opposer's Motion, Applicant strongly disputes and specifically denies the substantive basis for the amended Notice of Opposition. Indeed, there is no requirement that Applicant develop documents that support its intent to use a particular mark and the Board has already determined that, in many circumstances, it is reasonable for an applicant not to have any documents due to the uncertainty of its business plans in light of an Opposition proceeding. See, e.g., *Imedica Corp. v. Medica Health Plans*, No. 92043288 2007 W.L. 1697344, at *3 (T.T.A.B. June 7, 2007).

¹ It should be noted that Applicant would have offered its consent to the Motion for Leave to Amend had it been asked.

Applicant will address the factual and legal deficiencies with the Amended Notice of Opposition at the proper time. For now however, the Board should grant Opposer's Motion and enter the Amended Notice of Opposition, after which time Applicant will timely file its amended answer.

Respectfully submitted,



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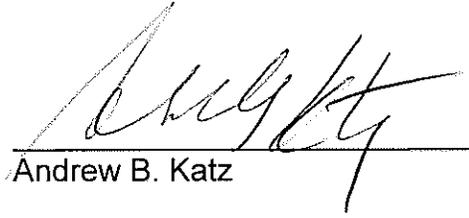
Counsel to Global Tissue Group, Inc.

Dated: July 10, 2009

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2009, a true and correct copy of the foregoing Applicant's Response to Opposer's Motion for Leave to Amend Notice of Opposition was sent by first class mail, postage pre-paid to the following:

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