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

Proceeding	91196999
Party	Defendant Coach Services, Inc.
Correspondence Address	NORMAN H. ZIVIN COOPER & DUNHAM LLP 30 ROCKEFELLER PLZ FL 20 NEW YORK, NY 10112-0077 nzivin@cooperdunham.com
Submission	Answer
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Date	11/29/2010
Attachments	Applicants Answer to Notice of Opposition_11 29 10_82108.pdf (3 pages)(81748 bytes)

Dkt: 82108

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

LEVI STRAUSS & Co., Opposer,	
v.	Opposition No. 91196999
COACH SERVICES, INC., Applicant.	

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Applicant, COACH SERVICES, INC., through its attorneys, hereby answers the Notice of Opposition as follows:

1. Applicant admits the allegations of paragraph 1.

2. Applicant denies the allegations of paragraph 2, except admits that the registrations pleaded are in the name of Opposer and copies are attached to the Notice of Opposition.

3. Applicant is without knowledge or information sufficient to form a belief concerning the truth of the allegations of paragraph 3, and therefore denies same.

4. Applicant is without knowledge or information sufficient to form a belief concerning the truth of the allegations of paragraph 4, and therefore denies same.

5. Applicant is without knowledge of information sufficient to form a belief concerning the truth of the allegations of paragraph 5, and therefore denies same.

6. Applicant denies the allegations of paragraph 6.

7. Applicant denies the allegations of paragraph 7.

8. Applicant denies the allegations of paragraph 8.

9. Applicant denies the allegations of paragraph 9.

10. Applicant denies the allegations of paragraph 10, except admits that a federal registration is entitled to the benefits conferred by the Lanham Trademark Act.

AFFIRMATIVE DEFENSE

11. There is no likelihood of confusion between Applicant's prospective use of its mark 510 for the range of goods identified in its trademark application and Opposer's use, if any, of the marks 501, 505, 517 and 569 for jeans.

12. Opposer's marks 510, 505, 517 and 569 are model or grade designations which are entitled only to a narrow scope of protection.

WHEREFORE, Applicant respectfully requests that Opposer's Notice of Opposition be dismissed.

COOPER & DUNHAM LLP

Dated: 11/29, 2010 By: _____

Norman H. Zivin
30 Rockefeller Plaza
New York, New York 10112
Tel: (212) 278-0400
Attorneys for Applicant
COACH SERVICES, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION** was served on this 29th day of November, 2010 by first class mail on the following attorney for Opposer:

Marie C. Seibel, Esq.
TOWNSEND and TOWNSEND and CREW LLP
Two Enbarcadero Center, 8th Floor
San Francisco, CA 9411-3834

Norman H. Zivin