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

Proceeding	91198122
Party	Defendant BDO Remittance (USA), Inc.
Correspondence Address	Nels T. Lippert WILMER CUTLER PICKERING HALE AND DORR 399 PARK AVENUE NEW YORK, NY 10022 Nels.lippert@wilmerhale.com
Submission	Answer
Filer's Name	Michael J. Bevilacqua
Filer's e-mail	nels.lippert@wilmerhale.com, michael.bevilacqua@wilmerhale.com
Signature	/michael j. bevilacqua/
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK AND TRIAL AND APPEAL BOARD

STICHTING BDO,

Opposer,

v.

BDO REMIT (USA), INC.,

Applicant.

Opposition No. 91198122

ANSWER

BDO Remit (USA), Inc. (“Remit” or “Applicant”), formerly known as BDO Remittance (USA), Inc., by and through its attorneys, hereby files an Answer to the Notice of Opposition filed by Stichting BDO (“Stichting” or “Opposer”). Responding to the preamble of the Notice of Opposition, Remit denies that Opposer will be damaged by registration of the BDO Remit mark as shown in Application Serial No. 77/765561 (the “Application”).

1. Remit admits the allegations contained in Paragraph 1.
2. Remit admits the allegations contained in Paragraph 2.
3. Remit admits the allegations contained in Paragraph 3.
4. Remit lacks information sufficient to form a belief as to the allegations in Paragraph 4 of the Notice of Opposition, and therefore denies the same.
5. Upon information and belief, Remit admits that Opposer is the owner of U.S. Trademark Reg. No. 2,699,803 for the mark BDO, which issued on March 25, 2003, based on an application filed on December 19, 2001. Remit admits that a TARR status report for this registration is available on the USPTO website. To the extent Paragraph 5 makes additional

allegations, Remit lacks information sufficient to form a belief as to those allegations, and therefore denies the same.

6. Upon information and belief, Remit admits that Opposer is the owner of U.S. Trademark Reg. No. 2,699,804 for the mark BDO INTERNATIONAL, which issued on March 25, 2003, based on an application filed on December 19, 2001. Remit admits that a TARR status report for this registration is available on the USPTO website. To the extent Paragraph 6 makes additional allegations, Remit lacks information sufficient to form a belief as to those allegations, and therefore denies the same.

7. Remit denies that its mark, BDO Remit, taken as a whole and in the context of the services under which it is used, is highly similar to Opposer's Marks.

8. Remit denies the allegations contained in Paragraph 8.

9. Remit lacks information sufficient to form a belief as to the allegations in Paragraph 9 of the Notice of Opposition, and therefore denies the same.

10. Remit denies the allegations contained in Paragraph 10.

11. Remit denies the allegations contained in Paragraph 11.

12. Remit denies the allegations contained in Paragraph 12.

13. Remit denies the allegations contained in Paragraph 13.

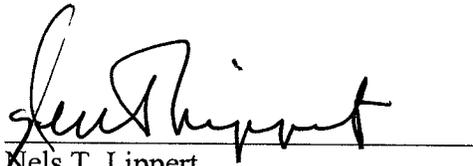
AFFIRMATION DEFENSES

14. Opposer has failed to state a claim upon which relief may be granted.

WHEREFORE, the Applicant, BDO Remit (USA), Inc., respectfully requests that the Trademark Trial and Appeal Board dismiss the Opposer's opposition with prejudice and grant registration of the Applicant's mark.

Dated: February 18, 2011

Respectfully submitted

A handwritten signature in black ink, appearing to read "Nels T. Lippert", written over a horizontal line.

Nels T. Lippert
Wilmer Cutler Pickering Hale And Dorr LLP
399 Park Avenue
New York, NY 10022
Tel: (212) 937-7201
Fax: (212) 230-8888
Email: nels.lippert@wilmerhale.com