

ESTTA Tracking number: **ESTTA423922**

Filing date: **08/08/2011**

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

Proceeding	91200419
Party	Defendant Thorsten Waldbroel
Correspondence Address	CHRISTOPHER DITICO RAJ ABHYANKER PC 1580 WEST EL CAMINO REAL , SUITE 8 MOUNTAIN VIEW, CA 94040-2462 UNITED STATES trademarks@rajpatent.com, nitin@rajpatent.com, cdditico@rajpatent.com, mabel@rajpatent.com
Submission	Answer
Filer's Name	Julie A. Greenberg
Filer's e-mail	docket@patlaw.com
Signature	/Julie A. Greenberg/
Date	08/08/2011
Attachments	SCU-10070_29.Applicants.Answer.to.Opposition.pdf ( 3 pages )(58569 bytes )

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

In the matter of trademark application Serial No. 85/202,395  
For the mark SAINT CRYSTAL

CHAMPAGNE LOUIS ROEDERER,

Opposer,

vs.

Opposition No. 91200419

THORSTEN WALDBROEL,

Applicant.

---

**APPLICANT'S ANSWER TO OPPOSITION**

---

Applicant, Thorsten Waldbroel, by and through his attorneys, hereby answers the allegations set forth in the Notice of Opposition as follows:

1. The Applicant admits the allegations of Paragraph 1.
2. Answering paragraph 2 of Notice of Opposition, the Applicant does not have sufficient knowledge or information to form a belief as to the allegations therein and accordingly denies the allegations and leaves Opposer to its proofs.
3. Answering paragraph 3 of Notice of Opposition, the Applicant does not have sufficient knowledge or information to form a belief as to the allegations therein and accordingly denies the allegations and leaves Opposer to its proofs.
4. Answering paragraph 4 of the Notice of Opposition, the Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained there in and accordingly and denies the allegations and leaves Opposer to its proofs.
5. The Applicant denies the allegations contained in paragraph 5.

6. The Applicant denies the allegations contained in paragraph 6.
7. The Applicant denies the allegations contained in paragraph 7.
8. The Applicant denies the allegations contained in paragraph 8.
9. The Applicant denies the allegations contained in paragraph 9.
10. The Applicant denies the allegations contained in paragraph 10.
11. The Applicant denies the allegations contained in paragraph 11.
12. The Applicant denies the allegations contained in paragraph 12.
13. The Applicant denies the allegations contained in paragraph 13.
14. The Applicant denies the allegations contained in paragraph 14.

**Relief Requested**

---

Wherefore, applicant requests that the Notice of Opposition be dismissed.

Respectfully submitted,

/s/Julie A. Greenberg  
Julie A. Greenberg  
GIFFORD, KRASS, SPRINKLE,  
ANDERSON & CITKOWSKI, P.C.  
2701 Troy Center Drive, Suite 330  
P.O. Box 7021  
Troy, MI 48007-7021  
(248) 647-6000  
(248) 647-5210 – Facsimile

*Attorney for Applicant*

Dated: August 8, 2011

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **APPLICANT'S ANSWER TO OPPOSITION** was sent via first class mail to the following:

John A. Clifford  
Merchant & Gould P.C.  
P.O. Box 2910  
Minneapolis, MN 55402-0910

on this 8<sup>th</sup> day of August, 2011.

/s/Julie A. Greenberg  
\_\_\_\_\_  
Julie A. Greenberg  
GIFFORD KRASS, SPRINKLE,  
ANDERSON & CITKOWSKI, P.C.  
2701 Troy Center Drive, Ste. 330  
P.O. Box 7021  
Troy, Michigan 48007-7021  
(248) 647-6000  
(248) 647-5210 – Facsimile

**CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that the foregoing ANSWER TO OPPOSITION was electronically filed with the Trademark Trial and Appeal Board on this 8<sup>th</sup> day of August, 2011.

/s/Julie A. Greenberg  
\_\_\_\_\_  
Julie A. Greenberg  
GIFFORD KRASS, SPRINKLE,  
ANDERSON & CITKOWSKI, P.C.  
2701 Troy Center Drive, Ste. 330  
P.O. Box 7021  
Troy, Michigan 48007-7021  
(248) 647-6000  
(248) 647-5210 – Facsimile