

ESTTA Tracking number: **ESTTA449885**

Filing date: **01/06/2012**

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

Proceeding	91202788
Party	Defendant John M. Van Zandt dba VANZA USA
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Submission	Answer
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Date	01/06/2012
Attachments	Answer.pdf (2 pages)(12711 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

Luster Products, Inc.,

Opposer

v.

John M. Van Zandt d/b/a/ Vanza USA

Applicant

Opposition No. 91/202,788

Ser. No. 77/119,006

Mark: PINKESSENCE

Published August 28, 2007

Answer of Applicant John M. Van Zandt d/b/a/ Vanza USA

Applicant John M. Van Zandt d/b/a/ Vanza USA (Vanza) responds to the Luster Products, Inc. (Luster) notice of opposition as follows:

1. Vanza lacks knowledge of the facts alleged in paragraph 1 of the notice of opposition. On that ground, it denies the allegations.

2. Vanza lacks knowledge of the facts alleged in paragraph 2 of the notice of opposition. On that ground, it denies the allegations.

3. Vanza denies the allegations in paragraph 3 of the notice of opposition.

4. Vanza admits that Luster owns the United States trademark registrations listed in paragraph 4 of the notice of opposition but denies the remaining allegations.

5. In response to paragraph 5 of the notice of opposition, Vanza admits that the United States trademark registrations listed in paragraph 4 of the notice of opposition have not been canceled and that the Patent and Trademark Office (PTO) has accepted declarations under Sections 8 and 15 of the Trademark Act for Registration Nos. 1503517, 1649218 and 1864492. It denies the remaining allegations of the paragraph.

6. Vanza denies the allegations in paragraph 6 of the notice of opposition.

7. Vanza denies the allegations in paragraph 7 of the notice of opposition.

8. Vanza denies the allegations in paragraph 8 of the notice of opposition.

9. Vanza denies the allegations in paragraph 9 of the notice of opposition.
10. Vanza denies the allegations in paragraph 10 of the notice of opposition.
11. Vanza admits the allegations in paragraph 11 of the notice of opposition but asserts that it does not need Luster's permission to use PINKESSENCE.
12. Vanza denies the allegations in paragraph 12 of the notice of opposition.
13. Because the allegations in paragraph 13 of the notice of opposition are contentions of law, no answer is required.
14. Vanza denies the allegations in paragraph 14 of the notice of opposition.

Therefore, Vanza requests that the board dismiss the opposition and allow the registration to issue.

January 6, 2012

/Michael Harris/

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2012, I am transmitting a copy of "Answer of Applicant John M. Van Zandt d/b/a/ Vanza USA" by first class mail to:

Burton S. Ehrlich, Esq.
Ladas & Parry
224 South Michigan Ave., Suite 1600
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January 6, 2012

/Anneliese Lomonaco/

Anneliese Lomonaco