

ESTTA Tracking number: **ESTTA530030**

Filing date: **04/02/2013**

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

Proceeding	91208855
Party	Defendant The Wine Group LLC
Correspondence Address	PAUL W REIDL LAW OFFICE OF PAUL W REIDL 241 EAGLE TRACE DRIVE, SECOND FLOOR HALF MOON BAY, CA 94019 UNITED STATES paul@reidllaw.com
Submission	Reply in Support of Motion
Filer's Name	Paul W Reidl
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Date	04/02/2013
Attachments	Motion to StrikeReply.pdf (3 pages)(35631 bytes)

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

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4 Application Serial No. 85/736,374

5 Mark: (B)URBAN

6 Class: 33

7 _____)
8 **GREATER LOUISVILLE**)
9 **CONVENTION & VISITORS**)
10 **BUREAU,**)

11 Opposer/Respondent,)

12 v.)

13 **THE WINE GROUP, LLC,**)

14 Applicant/Counterclaimant.)
15 _____)

Opposition No. 91208855

REPLY ON
MOTION TO STRIKE
AFFIRMATIVE DEFENSES 2-4

16 The Wine Group (TWG) moved to strike Affirmative Defenses 2-4 because they were
17 not pleaded properly. These included laches, estoppel, acquiescence and unclean hands.
18 Respondent did not attempt to defend its original pleading. Instead, it conceded the motion by
19 moving to amend its Answer. Accordingly, the motion must be granted. TWG will respond
20 separately to the motion in the time permitted by the Board's Rules.

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Respectfully submitted,

LAW OFFICE OF PAUL W. REIDL



By: _____

Dated: April 2, 2013

Paul W. Reidl
Law Office of Paul W. Reidl
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Second Floor
Half Moon Bay, CA 94019
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*Attorney for Applicant,
The Wine Group*

1 **PROOF OF SERVICE**

2 On April 2, 2013, I caused to be served the following document:

3 **REPLY ON MOTION TO STRIKE AFFIRMATIVE DEFENSES 2-4**

4 on Opposer by placing a true copy thereof in the United States mail enclosed in an envelope,
5 postage prepaid, addressed as follows to their counsel of record at his present business address:

6 John A. Galbreath
7 Galbreath Law Offices
8 2516 Chestnut Woods Ct.
9 Reisterstown, MD 21136-5523

10 Executed on April 2, 2013 at Half Moon Bay, California.

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