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

Proceeding	91210265
Party	Defendant Yonetani Takushi
Correspondence Address	TANAKA SATOSHI 4-4-28 KOUDA IKEDA OSAKA, 563-0043 JAPAN kwebb@pearne.com, ssolomon@pearne.com
Submission	Answer
Filer's Name	Donna M. Klett
Filer's e-mail	tmdock- et@pearne.com,dklett@pearne.com,ssolomon@pearne.com,kwebb@pearne.co m
Signature	/donnamklett/
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

ALLSTATE INSURANCE COMPANY,

Opposer,

v.

TAKUSHI YONETANI,

Applicant.

Opposition No.: 91210265

Application No.: 79118763

Mark: ALLSTATE

ANSWER TO NOTICE OF OPPOSITION

Applicant, Takushi Yonetani (“Applicant”), hereby answers the Notice of Opposition filed April 9, 2013 by Opposer Allstate Insurance Company (“Opposer”). In response to the correspondingly numbered paragraphs in the Notice of Opposition, Registrant responds as follows:

Introductory Paragraphs: Applicant admits he filed application serial no. 79118763 to register ALLSTATE for tires, namely, tires for motorcycles and automobiles. Applicant denies that Opposer would be damaged by registration of Applicant’s ALLSTATE mark for these goods. Applicant has insufficient knowledge to admit or deny the remaining allegations in the Introductory Paragraphs and therefore denies them.

1. Applicant has insufficient knowledge to admit or deny the allegation in paragraph 1 and therefore denies it.

2. Applicant has insufficient knowledge to admit or deny the allegations in paragraph 2 and therefore denies them.

3. Applicant has insufficient knowledge to admit or deny the allegations in paragraph 3 and therefore denies them.

4. Applicant admits that “a flat tire” is the first threat listed in the Roadside Assistance Plans & Services screenshot reproduced in paragraph 4. Applicant has insufficient knowledge to admit or deny the remaining allegations in paragraph 4 and therefore denies them.

5. Applicant admits that the U.S. Patent and Trademark Office’s Internet-accessible TSDR database identifies Opposer as the owner of Reg. Nos. 761091 and 759366, and that the TSDR database further indicates that Declarations of Incontestability were filed in the two registrations. Applicant lacks sufficient knowledge to admit or deny the remaining allegations in paragraph 5 and therefore denies them.

5. Applicant admits that the U.S. Patent and Trademark Office’s Internet-accessible TSDR database identifies Opposer as the owner of Reg. No. 3833066. Applicant denies the remaining allegations in paragraph 5.

6. Denied.

7. Denied.

Conclusion

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

Respectfully submitted,

TAKUSHI YONETANI

By: /donnamklett/
Steven J. Solomon
Donna M. Klett
Pearne & Gordon LLP
1801 East 9th Street, Suite 1200
Cleveland, Ohio 44114-3108
Tel: (216) 579-1700
Fax: (216) 579-6073
Email: ssolomon@pearne.com; dklett@pearne.com
Attorneys for Applicant

Certificate of Service

I hereby certify that on the date indicated below the foregoing Answer to Notice of Opposition was served on the Attorney for the Opposer via first-class mail in an envelope addressed as follows:

Marsha K. Hoover
Richard M. LaBarge
Marshall, Gerstein & Borun LLP
233 S. Wacker Drive Suite 6300
Chicago, IL 60606

Date: February 16, 2015

/donnamklett/
Donna M. Klett
Attorney for Applicant