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Filing date: **10/23/2013**

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

Proceeding	91212009
Party	Defendant JOANES WUNARYO
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Submission	Answer
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Date	10/23/2013
Attachments	Answer to Opposer's Notice of Opposition, Opposition No. 91212009.pdf(15605 bytes)

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

HBI BRANDED APPAREL)	
ENTERPRISES, LLC,)	
Opposer,)	Opposition No.: 91212009
)	
v.)	U.S. Trademark Application
)	Serial No. 85/745,511
JOANES WUNARYO,)	
)	
Applicant.)	
)	

ANSWER TO OPPOSER'S NOTICE OF OPPOSITION

COMES NOW Applicant, JOANES WUNARYO, by and through his attorneys and for his Answer to Opposer's Notice of Opposition states as follows:

Facts Common to all Grounds for Opposition

1. Applicant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 1 and therefore, DENIES the same.
2. Applicant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 2 and therefore, DENIES the same.
3. Applicant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 3 and therefore, DENIES the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 4 and therefore, DENIES the same.
5. Applicant DENIES the allegations of Paragraph 5.
6. Applicant DENIES the allegations of Paragraph 6.

7. Applicant is without knowledge or information sufficient to form a belief as to the allegations of Paragraph 7 and therefore, DENIES the same.

8. Applicant ADMITS that it seeks registration of the mark L'GS LEADER GENERATION SYSTEM and Design (the "LEADER GENERATION SYSTEM mark") for use in connection with clothing, namely, pants, shorts, shirts, t-shirts, sweaters, jeans, polo shirts, jackets, skirts, coats, rain coats, capris, uniforms, swimwear, blouses, men's and women's underwear, footwear including shoes, socks, sandals, sports shoes, sneakers, boots; headgear, namely, hats, caps, bandanas; scarves; belts in Class 25.

Ground I – Likelihood of Confusion

9. Applicant incorporates by reference its allegations in response to Paragraphs 1-8 above, as if fully set forth herein.

10. Applicant DENIES the allegations of Paragraph 10.

11. Applicant DENIES the allegations of Paragraph 11.

12. Applicant DENIES the allegations of Paragraph 12.

13. Applicant DENIES the allegations of Paragraph 13.

14. Applicant ADMITS that it seeks registration of the LEADER GENERATION SYSTEM mark for use in connection with "socks", "men's and women's underwear" and "footwear including shoes, socks". However, Applicant DENIES all other allegations of Paragraph 14.

15. Applicant DENIES the allegations of Paragraph 15.

16. Applicant ADMITS that registration of the LEADER GENERATION SYSTEM mark would give color and exclusive statutory right to Applicant as set forth in Paragraph 16. Applicant DENIES all other allegations of Paragraph 16.

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

Filing Date: October 4, 2012 U.S. Trademark Application Serial No.: 85/745,511
Published: April 16, 2013

HBI BRANDED APPAREL)
ENTERPRISES, LLC,)
Opposer,) Opposition No.: 91212009
v.)
JOANES WUNARYO,)
Applicant.)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing **ANSWER TO OPPOSER'S NOTICE OF OPPOSITION** was served upon Opposer by depositing the same in the United States mail, first class postage prepaid, on this 23rd day of October, 2013, addressed to:

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