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Filing date: **03/31/2014**

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

Proceeding	91214123
Party	Defendant Cashmere Classics Corp
Correspondence Address	MARC H. TRACHTENBERG WINSTON & STRAWN LLP 35 W WACKER DR STE 4200 CHICAGO, IL 60601-1695  mtrachtenberg@winston.com,sowen@winston.com,NLevantian@winston.com
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Date	03/31/2014
Attachments	CHI- #2824135-v1-Answer_to_Opposition_No_91214123_re_NIKKY_VERBIER.pdf(1 8653 bytes )

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

In re the matter of Application  
Serial No.: 85/927,395

Mark: NIKKY VERBIER

Published in the Official Gazette  
on October 22, 2013

_____	)	
PENROD MANAGEMENT GROUP INC.,	)	
	)	
Opposer,	)	
	)	
v.	)	ANSWER
	)	Opposition No.: 91214123
	)	
CASHMERE CLASSICS CORP	)	Attorney Docket No.: 86410.1
	)	
Applicant.	)	
_____	)	

**ANSWER**

Applicant, Cashmere Classics Corp ("Applicant") answers the Notice of Opposition (the "Notice") of Opposer, Penrod Management Group Inc. ("Opposer"), as follows:

**Preliminary Assertions**

Applicant denies that Opposer will be damaged by registration of the mark shown above.

Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this second introductory paragraph, and on that basis denies such allegations.

**Jurisdiction**

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1, and on that basis denies the allegations.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2, and on that basis denies the allegations.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3, and on that basis denies the allegations.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4, and on that basis denies the allegations.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5, and on that basis denies the allegations.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6, and on that basis denies the allegations.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7, and on that basis denies the allegations.

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8, and on that basis denies the allegations.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9, and on that basis denies the allegations.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10, and on that basis denies the allegations.

11. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11, and on that basis denies the allegations.

**Basis For Opposition**

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12, and on that basis denies the allegations.

13. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13, and on that basis denies the allegations.

14. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14, and on that basis denies the allegations.

15. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15, and on that basis denies the allegations.

16. Denied.

17. Denied.

18. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18, and on that basis denies the allegations.

19. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19, and on that basis denies the allegations.

**Conclusion**

20. Denied.

**FIRST AFFIRMATIVE DEFENSE**

21. The Notice fails to state a sufficient basis on which to oppose the registration of Applicant's mark and fails to state a claim upon which relief may be granted.

**PRAYER FOR RELIEF**

WHEREFORE, Applicant requests judgment dismissing Opposer's Notice and this proceeding in its entirety with prejudice, and that Applicant's application for the mark NIKKY VERBIER, Serial No. 85/927,395, be registered to Applicant.

Dated: March 31, 2014.

Respectfully submitted,

WINSTON & STRAWN LLP

By: /Marc H. Trachtenberg/

WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
Telephone: (312) 558-7964  
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*Attorney for Applicant,  
Cashmere Classics Corp*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Answer has been served on Penrod Management Group Inc. and West Indies Trading Company LLC by mailing said copy on March 31, 2014 via First Class Mail, postage prepaid to: Steve Savola, Penrod Management Group Inc., One Ocean Drive, Miami Beach, FL 33139.

*/Marc H. Trachtenberg/*

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

In re the matter of Application  
Serial No.: 85/927,395

Mark: NIKKY VERBIER

Published in the Official Gazette  
on October 22, 2013

WEST INDIES TRADING COMPANY LLC	)	
	)	
Opposer,	)	
	)	
v.	)	ANSWER
	)	Opposition No.: 91214123
	)	
CASHMERE CLASSICS CORP	)	Attorney Docket No.: 86410.1
	)	
Applicant.	)	
	)	

**ANSWER**

Applicant, Cashmere Classics Corp ("Applicant") answers the Notice of Opposition (the "Notice") of Opposer, West Indies Trading Company LLC ("Opposer"), as follows:

**Preliminary Assertions**

Applicant denies that Opposer will be damaged by registration of the mark shown above.

Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this second introductory paragraph, and on that basis denies such allegations.

**Jurisdiction**

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1, and on that basis denies the allegations.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2, and on that basis denies the allegations.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3, and on that basis denies the allegations.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4, and on that basis denies the allegations.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5, and on that basis denies the allegations.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6, and on that basis denies the allegations.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7, and on that basis denies the allegations.

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8, and on that basis denies the allegations.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9, and on that basis denies the allegations.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10, and on that basis denies the allegations.

11. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11, and on that basis denies the allegations.

**Basis For Opposition**

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12, and on that basis denies the allegations.

13. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13, and on that basis denies the allegations.

14. Denied.

15. Denied

16. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 and on that basis denies the allegations.

17. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17, and on that basis denies the allegations.

**Conclusion**

18. Denied.

**FIRST AFFIRMATIVE DEFENSE**

19. The Notice fails to state a sufficient basis on which to oppose the registration of Applicant's mark and fails to state a claim upon which relief may be granted.

**PRAYER FOR RELIEF**

WHEREFORE, Applicant requests judgment dismissing Opposer's Notice and this proceeding in its entirety with prejudice, and that Applicant's application for the mark NIKKY VERBIER, Serial No. 85/927,395, be registered to Applicant.

Dated: March 31, 2014.

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*Attorney for Applicant,  
Cashmere Classics Corp*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Answer has been served on Penrod Management Group Inc. and West Indies Trading Company LLC by mailing said copy on March 31, 2014 via First Class Mail, postage prepaid to: Steve Savola, Penrod Management Group Inc., One Ocean Drive, Miami Beach, FL 33139.

*/Marc H. Trachtenberg/*

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