

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

Chrysler Jeep, LLC	)	
	)	
Opposer/Plaintiff	)	
	)	
	)	Proceeding No. 91215686
	)	
Jeen International Corporation	)	
	)	
Defendant/Applicant	)	86 005 240

Defendant's Answer

By Order dated September 9, 2014, the Board granted a motion filed by Jeen International Corporation ("Defendant"), with the consent of Chrysler Jeep, LLC ("Plaintiff"), to suspend proceedings pending settlement discussions between the parties, setting October 10, 2014 as the time for answer.

Defendant, through undersigned counsel, by way of its Answer to the Notice of Opposition (the "Notice") in this matter hereby states as follows:

1. As for the allegations contained in Paragraph 1 of the Notice, Defendant admits that Plaintiff is the owner of United States Trademark Registration Nos. 0526175, 1081322 and 1130015.
2. Plaintiff has not listed the U.S. trademark registrations and goods recited therein that support the allegations contained in Paragraph 2 of the Notice; accordingly, Defendant denies these allegations, demanding strict proof thereof.
3. Defendant does not have knowledge or information regarding Plaintiff's marketing or other business activities sufficient to form a belief as to the allegations contained in Paragraph 3 of the Notice and therefore denies the allegations, demanding strict proof thereof.
4. Defendant does not have knowledge or information regarding Plaintiff's marketing or other business activities sufficient to form a belief as to the allegations contained in Paragraph 4 of the Notice and therefore denies the allegations, demanding strict proof thereof. Further, Paragraph 4 of the Notice sets forth conclusions of law to which no response is required.
5. Paragraph 5 of the Notice sets forth conclusions of law to which no response is



\*10-16-2014\*

required. To the extent a response is required, Respondent denies the allegations contained in Paragraph 5 of the Notice.

6. As for the allegations contained in Paragraph 6 of the Notice, Defendant admits that it filed an application for registration of the trademark "JEEPON" in International Class 001 for "chemicals for use in the manufacture of cosmetic, personal care and pharmaceutical products, namely, methyl taurate esters; and that this application was assigned U.S. Serial No. 86/005,240.
7. As for the allegations contained in Paragraph 7 of the Notice, Defendant admits that U.S. Serial No. 86/005,240 lists a first use anywhere date of the JEEPON mark and a first use in commerce date of the JEEPON mark of April 19, 1996. The remainder of the allegations in Paragraph 7 of the Notice sets forth conclusions of law to which no response is required. To the extent a response is required, Respondent denies the allegations contained in Paragraph 7 of the Notice.
8. Paragraphs 8, 9 and 10 of the Notice sets forth conclusions of law to which no response is required. To the extent a response is required, Respondent denies the allegations contained in Paragraphs 8, 9, and 10 of the Notice.

WHEREFORE, the foregoing considered, Defendant respectfully requests that the Opposition be dismissed with prejudice.

Dated: October 10, 2014

Respectfully submitted,

Louis C. Paul & Associates, PLLC  
Attorneys for Defendant

By:



Louis C. Paul, Esq.

299 Park Avenue, 6<sup>th</sup> Floor  
New York, NY 10171  
Tel – (212) 223-8200  
Fax – (203) 621-3420

CERTIFICATE OF SERVICE

This is to certify that I am on this date serving a copy of the within and foregoing upon the Plaintiff by depositing a true and correct copy of same in the United States Mail in an envelope with sufficient first class postage affixed thereon to ensure delivery, addressed as follows:

Kristen I. Spano  
Senior Trademark Counsel  
Chrysler Group LLC, CIMS 485-13-32  
1000 Chrysler Drive  
Auburn Hills, MI 48326

Dated: October 10, 2014

By:

A handwritten signature in black ink, appearing to read "Louis C. Paul", written over a horizontal line.

Louis C. Paul, Esq.