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

Proceeding	91215813
Party	Defendant International Pastry Concepts LLC
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Date	04/23/2015
Attachments	04.23.15 Motion to Amend Answer FINAL wAttachments.pdf(1286125 bytes )

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

**Najat Kaanache and  
Crystalline Management, LLC,  
Opposers,**

v.

**International Pastry Concepts LLC  
and Dominique Ansel,  
Applicants.**

Opposition No.: 91215813  
Application Serial No.: 85/936,327

Date of Publication: December 10, 2013  
Mark: **CRONUT**

**APPLICANTS INTERNATIONAL PASTRY CONCEPTS LLC AND DOMINIQUE  
ANSEL'S MOTION TO AMEND THEIR ANSWER TO SECOND AMENDED  
NOTICE OF OPPOSITION AND AFFIRMATIVE DEFENSES**

Pursuant to the provisions of Fed. R. Civ. P. 15(a)(2), 37 C.F.R. § 2.107(a) and TBMP § 507, Applicants International Pastry Concepts LLC and Dominique Ansel (collectively, "Applicants"), by and through undersigned counsel, hereby move the Board for an Order permitting Applicants to amend their previously filed Answer to Second Amended Notice of Opposition and Affirmative Defenses [DE-12] for the purposes of streamlining the pleadings and discovery in this proceeding. The grounds for this motion are more fully set forth in the Memorandum of Law submitted herein as required by 37 C.F. R. § 2.127(a).

**MEMORANDUM OF LAW**

Applicants' filed their application to register their CRONUT mark, U.S. Application Serial No. 85/936,327 ("327") on May 19, 2013, with a first use in commerce date of May 10, 2013. The '327 application was published for opposition on December 10, 2013, and this opposition proceeding was subsequently initiated [DE-1] on January 8, 2014. On May 18, 2014, Applicants filed their Answer to Notice of Opposition, Affirmative Defenses, and Motion to Dismiss. [DE-4 & 5]. Following the Board's October 3, 2014 Order [DE-10], and pursuant to

leave granted by the Board, Opposers amended their pleadings by filing their Second Amended Notice of Opposition [DE-11] on October 23, 2014. This serves as Opposers' operative pleading in this matter. See Jet, Inc. v. Sewage Aeration Sys., 223 F.3d 1360, 1365 (Fed. Cir. 2000), citing Charles Alan Wright et al., Federal Practice and Procedure § 1476 (2d ed. 1990) ("A pleading that has been amended under Rule 15(a) [of the Federal Rules of Civil Procedure] supersedes the pleading it modifies. . . . Once an amended pleading is interposed, the original pleading no longer performs any function in the case . . ."). Applicants responded to Opposers' amended pleading by filing their Answer to Second Amended Notice of Opposition and Affirmative Defenses [DE-12], which serves as Applicants' operative pleading in this matter. Id.

On December 5, 2014, the Board participated in a discovery and settlement conference between the parties. Subsequent to the teleconference, the Board ruled in its December 16, 2014 Order, that Applicants' Third and Sixth "Affirmative Defenses" alleged in Applicants' Answer to Second Amended Notice of Opposition and Affirmative Defenses are not "affirmative defenses" at all; however, the Board did not strike the language of those two sections of Applicants' pleadings. [DE-15]. The Board specifically noted that the Third "Affirmative Defense" is "merely an amplification of Applicants' denials with respect to Opposers' descriptiveness claim," and therefore not properly pleaded as an "affirmative defense." Id. The Board also noted that, while the Sixth "Affirmative Defense" is not properly pleaded as an "affirmative defense," the Board "does not find it necessary to strike this language from the Answer and Applicants are left to their proofs on this assertion." Id.

On March 30, 2015, undersigned counsel entered an appearance in this matter as co-counsel for Applicants. After further examination and review of the operative pleadings, Applicants have decided not to expend resources proving assertions that have already been ruled

by the Board to be invalid “affirmative defenses,” particularly when portions of the Sixth “Affirmative Defense,” drafted and filed prior to the undersigned’s appearance in this matter, are ambiguous, difficult to interpret and, as written, not clearly comprehensible. Applicants’ seek to streamline this litigation by removing these “affirmative defenses.” Applicants’ proposed Amended Answer does not add or clarify claims; instead, it withdraws two “affirmative defenses” that the Board has previously ruled to be improper.

Pursuant to Fed. R. Civ. P. 15(a)(2), leave to amend a party’s pleadings should be freely given when justice so requires. The Board has a long history of granting leave to amend pleadings, unless entry of the proposed amendment would violate settled law or be prejudicial to the rights of the adverse party. The Board has already permitted Opposers to amend their pleadings in this matter, and the Board has similarly permitted other applicants in other matters to amend for analogous purposes. See Estate of Biro v. Bic Corp., 18 USPQ2d 1382, 1383 (TTAB 1991) (Board permits applicant to amend its answer in opposition proceeding). The proceedings are still in the early stages of discovery, with over three and a half months until discovery closes. The Board should find, as it did in Zanella Ltd. v. Nordstrom Inc., 90 U.S.P.Q.2D 1758, 1759 (TTAB 2009) (Board finds no prejudice in allowing an amendment to the pleadings when there’s three and a half months remaining in the discovery period), that the proposed Amended Answer is not prejudicial to the rights of Opposers. Indeed, the Board has found no prejudice in other proceedings, even at later stages of discovery. See Focus 21 International Inc. v. Pola Kasei Kogyo Kabushiki Kaisha, 22 U.S.P.Q.2D 1316, 1318 (TTAB 1992) (no undue prejudice to respondent when motion to amend was filed prior to opening of petitioner’s testimony period); see also Flatley v. Trump, 11 USPQ2d 1284, 1286 (TTAB 1989) (respondent not prejudiced when Board permits amended pleadings during discovery stage).

Particularly where, as here, the Board's ruling that the "affirmative defenses" were not properly pleaded, was a result of Opposers' own argument to that effect.<sup>1</sup> The Board, in essence, granted Opposers the relief they sought.

Opposers were granted leave by the Board to amend their Notice of Opposition to re-plead their improperly pleaded descriptiveness claim. Applicants seek to amend their pleadings, not to clarify or re-plead an insufficient claim as Opposers did, but to withdraw claims that have been found by the Board to be legally insufficient. These amendments are timely and will serve a useful purpose by reducing the costs associated with having to litigate defunct claims.

Applicants have sought Opposers' consent to file their proposed Amended Answer, pursuant to the Board's instructions in its December 16, 2014 Order regarding "Contested Motions." Applicants' counsel sent e-mail correspondence to Opposers' counsel requesting Opposers' consent to Applicants' proposed amended pleadings as described herein. Applicants' counsel provided Opposers' counsel with a red-lined copy of the proposed modifications, which reflected the substantive changes to the body of the pleading (formatting changes, and the modifications to the pleading title, signature block, and the appointment of counsel paragraph were not included in the copy sent to Opposers' counsel). Opposers' counsel responded that Opposers do not consent to Applicants' filing their proposed Amended Answer, and that should Applicants file a motion for leave to amend, Opposers will contest the motion.

Wherefore, Applicants respectfully request leave to file the foregoing amendments. A signed Amended Answer to Second Amended Notice of Opposition and Affirmative Defenses, and a red-lined copy showing the proposed changes, are attached hereto, pursuant to TBMP § 507.01.

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<sup>1</sup> Undersigned was not present at the teleconference, but it is unreasonable to assume that Applicants argued that their own affirmative defenses were invalid.

Date: April 23, 2015

Respectfully submitted,

**LOTT & FISCHER, PL**

s/Noah H. Rashkind/

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the foregoing document is being served upon Opposers by delivering a true and correct copy of same to counsel for Opposers via U.S. Mail and a courtesy copy by electronic mail on April 23, 2015 as follows:

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“Mark”), by and through Counsel, Candice S. Cook for The Cook Law Group, PLLC, [and Leslie J. Lott, Ury Fischer, and Noah H. Rashkind of Lott & Fischer, P.L.](#), to Opposers’ Second Amended Notice of Opposition (hereinafter “Notice of Opposition”) filed on October 23, 2014 by Najat Kaanache and Crystalline Management, LLC (hereinafter “Opposers”).— Applicants hereby reply to the numbered grounds for opposition set forth in the Notice of Opposition as follows:

1. Applicants deny each and every allegation contained in ¶ 1 of the Notice of Opposition.  
The term CRONUT in class 30 was created by Dominique Ansel at his bakery located at 189 Spring Street in New York City on May 10, 2013. An Exhibit in support of this fact is attached as Exhibit 1.
2. Denied.
3. Admit.
4. Admit.
5. Answering ¶ 5 of the Notice of Opposition, Applicants admit that they are seeking the registration of the trademark CRONUT and that Opposers’ subsequent registration—which was filed after the extensive global media coverage of Applicants’ trademark application and which followed the widely covered success and fame of Applicants’ original pastry product—is substantially identical to Applicants’ mark, but otherwise deny each and every allegation contained therein.
6. Applicants admit that their trademark application for CRONUT encompasses doughnuts, but otherwise deny each and every allegation in ¶ 6 of the Notice of Opposition.
7. Applicants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 7 of the Notice of Opposition—specifically, whether “the

goods set forth in Applicants' CRONUT application are or will be advertised, promoted, sold, and distributed to customers who are the same customers to which Opposers said CRONUTS donuts are advertised and sold." Since Applicants can neither admit nor deny the allegations as written, Applicants therefore deny the allegations.

8. Applicants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 8 of the Notice of Opposition. Since Applicants can neither admit nor deny the allegations as written, Applicants therefore deny the allegations.
9. Denied.
10. Denied.
11. Denied.
12. Applicants repeat and reallege paragraphs 1 through 11 hereof as though fully set forth herein. Applicants also submit and present to the panel that on October 3, 2014, the Trademark Trial and Appeal Board dismissed Opposers' descriptiveness claims in its holding of Applicants' Motion to Dismiss. Accordingly, Applicants object to Opposers' attempt to re-enter the descriptiveness claim into the record and as an issue in this action.
13. Applicants admit that the term CRONUT refers to the hybrid donut/croissant pastry created by Chef Dominique Ansel and sold at his bakery in New York and around the United States of America. See Exhibit 2.
14. Denied. See Exhibit 3.
15. Denied. See Exhibit 3.
16. Denied. See Exhibit 3.
17. Denied. See Exhibit 3.
18. Denied.

19. Applicants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 19 and therefore deny these allegations.
20. Denied.
21. Denied.
22. Applicants repeat and reallege paragraphs 1 through 21 hereof as though fully set forth herein.
23. Denied.
24. Denied.
25. Applicants repeat and reallege paragraphs 1 through 24 hereof as though fully set forth herein.
26. Admit.
27. Admit.
28. Applicants admit to their counsel's use of the ™ symbol in correspondence sent to Opposers' counsel to address Opposers' infringement of Applicants' rights. Since Applicants can neither admit nor deny further the paragraph as written, Applicants deny the remaining allegations.
29. Denied. Applicants utilized the ® only after receiving the Registration Certificate from the USPTO and subsequently made a good faith effort to remove the registration symbol from bakery materials upon learning of the clerical error at the USPTO. In fact, Opposers' own Exhibit 1 attached to their Notice of Opposition illustrates that in the tag line and heading of the website where Applicants seek to inform and educate customers about the CRONUT pastry—titled Cronut 101—Applicants are using the ™ and **NOT**

the ®. A true and correct copy of Applicants' website dated October 31, 2014 is attached as Exhibit 4.

30. Denied.

31. Applicants repeat and reallege paragraphs 1-30 hereof as though fully set forth herein.

32. Admit.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

### **AFFIRMATIVE DEFENSES**

Applicants assert that the following affirmative defenses bar Opposers' requested relief in their Second Amended Notice of Opposition.

#### **FIRST AFFIRMATIVE DEFENSE—Failure to State a Claim**

Opposers' fail to state a claim upon which relief may be granted.

#### **SECOND AFFIRMATIVE DEFENSE—Laches, Waiver, Acquiescence, & Estoppel**

Applicants have been using the Mark and developing consumer recognition and goodwill therein since at least May 10, 2013, such use being open, notorious, and known to Opposers and such knowledge, in turn, being known to Applicants. During this time, Opposers failed to take *any* action to assert the claims on which they base their Opposition, on which inaction Applicants

have relied to their detriment. Opposers' claims are consequently barred by the doctrines and equitable defenses of laches, waiver, acquiescence, and estoppel.

~~**THIRD AFFIRMATIVE DEFENSE—Acquired Distinctiveness**~~

~~As a result of Applicants' continuous use of the Mark since the time of Applicants' adoption thereof, the Mark has developed significant local, regional, and international goodwill and fame among the consuming public as well as consumer acceptance of the services offered by Applicants in conjunction with the Mark. Such goodwill and widespread usage has caused the Mark to acquire distinctiveness with respect to Applicants, and caused the Mark to be a valuable asset of Applicants. To date, Applicants have received accolades from *Time Magazine*, *People Magazine*, *Vogue Magazine*, and most recently, The Tribeca Disruptive Innovation Award. Support of this goodwill, distinctiveness, and secondary meaning can be found in the document attached hereto as Exhibit 5.~~

~~**FOURTH-THIRD AFFIRMATIVE DEFENSE—Lack of Standing**~~

\_\_\_Opposers lack standing to assert claims surrounding the CRONUTS trademark. Opposers have not established title to the mark CRONUTS and have failed to establish a real interest and reasonable belief for an equal right to use the mark for goods. *Zero* evidence was submitted with this Notice of Opposition to illustrate *any* prior usage of the term CRONUTS and more specifically, any prior usage of the term Cronuts in Class 30. Crystalline Management has not asserted any facts to support or illustrate *any* relationship, use, or title to the mark CRONUTS or this Notice of Opposition. Najat Kaanache is a former chef at Private Social—an establishment that has since closed and, thus, is no longer in business. Opposers have failed to illustrate any intellectual property rights in CRONUTS. Accordingly, they lack standing to assert any claims via the Notice of Opposition.

~~FIFTH~~ FOURTH AFFIRMATIVE DEFENSE—Unclean Hands

\_\_\_ Opposers have unclean hands. On or around June 10, 2013, Opposers engaged in drastic and overt measures to intentionally and wrongfully divert Applicants’ customers, fans, and professional colleagues through actions intended to cause consumer confusion, including *inter alia*, by the use of the same Mark. It was not until Dominique Ansel received fame and monetary success from his original CRONUT pastry creation that Opposers’ sought to a) trademark the term CRONUTS; b) resurrect an appetizer that it had discontinued and which was undeniably *unrelated to a hybrid croissant doughnut pastry* and was in fact a crawfish croquette on some days and a crab patty on others; c) change the entire formulation of its previous croquette in an attempt to directly mimic the Applicants’ unique creation in a dubious effort to bamboozle both the USPTO and customers; and d) file for classification with the USPTO under International Class 30 *after* Dominique Ansel filed for trademark registration of the name CRONUT, despite the fact that the Opposers’ alleged product had been discontinued from its menu and was a seafood product that—if it were to be trademarked at all—belonged in International Class 29. Opposers have also altered the product configuration of their product to more closely resemble Applicants in a bad faith effort *to cause* the exact likelihood of confusion that Opposers now allege in this Notice of Opposition. Opposers’ only goals in these efforts have been to hijack the rightful trademark ownership rights from Dominique Ansel and to serve as “trademark trolls” in an unscrupulous attempt to preclude Dominique Ansel from receiving his rightful federal trademark protection.

~~SIXTH~~ AFFIRMATIVE DEFENSE—~~Opposers’ Use is Generic & Descriptive~~

~~Opposers’ rights in and to the portion of its alleged CRONUTS trademark are generic or, in the alternative, merely descriptive of the goods or services offered under the mark. Opposers’~~

~~alleged mark is therefore inherently unprotectable absent acquired distinctiveness, which the alleged CRONUTS as used by Opposers lacks. Opposers' alleged mark was never used as a designation of the source of Opposers' goods or services, but by their own statements to the press and submissions to the USPTO was a general description of an item on a menu.~~

#### **SEVENTH FIFTH AFFIRMATIVE DEFENSE--Fraud**

\_\_\_ Opposers have conducted and continue to engage in fraudulent behavior as it pertains to the CRONUTS trademark. Opposers have stated to the United States Patent and Trademark Office and to the press that they created CRONUTS as a contraction for “creative doughnuts”—despite the absence of ANY EVIDENCE in support of Opposers’ assertions. The CRONUTS allegedly sold by Opposers were not doughnuts, but croquettes made of fish—a food item that belongs in a different class of goods and which Opposers knew were not to be classified under Class 30 and certainly were not “creative doughnuts”.

\_\_\_ Opposers alleged CRONUTS were briefly sold as appetizers, were classified as croquettes, and were *never identified* as creative doughnuts. Opposers have not had continuous usage of the name CRONUTS and discontinued the item on their menu until learning of Applicants’ famous pastry. Yet, after Opposers discontinued the alleged CRONUTS, and after the success, fame, and press surrounding Dominique Ansel, Opposers resurrected their crawfish product and subsequently and significantly changed the product aesthetically and via the recipe to attempt a blatant replication of Dominique Ansel’s unique creation including the material misrepresentation to the press and the USPTO that they were the priority users of the name CRONUTS. Opposers’ statements and representations to the USPTO are not true. Opposers’ ongoing deception and material misrepresentations to the United States Trademark and Patent Office has not ended with this Notice of Opposition, but has continued via their attempts to

procure CRONUTS applications in other categories—again in an effort to leach off of the success of Award Winning Chef, Dominique Ansel.

\_\_\_Opposers have sought to move additional “CRONUTS” related applications forward in the books category despite initiating the adjudication of these marks before the panel and with knowledge that a pending application for Mr. Ansel is before the USPTO in the same category. Even within the content of this Notice of Opposition, blatant misrepresentations have been submitted in an effort to needlessly delay, distract, and misrepresent the truth to this panel. Opposers’ own media references included within their Notice of Opposition supports the registration of the CRONUT mark for Dominique Ansel and cites his innovation, creativity, and responsibility for the creation of the distinct pastry, the Cronut pastry. Yet, Opposers’ fraudulently have sought to play fast and loose with the facts, the truth, and the USPTO’s time. Applicants and the USPTO have relied and continue to rely on Opposers’ representations to both the USPTO’s and Applicants’ detriment and the Opposers’ continuous fraudulent behavior should not be rewarded.

**EIGHTH SIXTH AFFIRMATIVE DEFENSE—Abandonment/Non-use**

\_\_\_Applicants are responsible for the creation, introduction, and invention of the CRONUT pastry, but even if Opposers’ allegations in the Notice of Opposition were true, Opposers are barred from relief under the doctrines of abandonment/non-use. Opposers have stated to the press that they first used the term CRONUTS as an item on a menu for the restaurant Private Social in Dallas, Texas. However, Opposers stopped using the name CRONUTS to describe its appetizer in spring of 2013 when they changed the menu at Private Social and advertised a new permanent “Awesome Texas Food” menu. Opposers removed CRONUTS from the menu thereby ceasing to both serve and sell them. Opposers had no intention of using the name “CRONUT” again or

resuming use in any fashion—that is, until Applicant Dominique Ansel independently created his unique pastry across the country, created the name CRONUT pastry for his hybrid croissant/doughnut pastry, registered to trademark the name, gained fame and accolades for his inventiveness, and Opposers decided to capitalize off of his success. Prior to Applicants’ fame and the success of Dominique Ansel’s CRONUT pastry, Opposers had stopped using the name CRONUT as a description on its menu for seafood croquettes with no intention of using it again.

Accordingly, they are barred from relief.

**NINTH SEVENTH AFFIRMATIVE DEFENSE—Failure To Police The Trademark**

\_\_\_ Opposers are barred from relief because Opposers have failed to police their alleged rights in the CRONUT trademark. Although Applicants assert that Opposers never used the Mark as a source identifier when it was an alleged menu item in Texas, even if they did, upon information and belief, Opposers have failed to effectively police its trademark against confusing or similar marks. In fact, upon information and belief, Opposers have failed to police the mark at all. Upon information and belief, Opposers have neglected to send demand letters to any third-parties alerting them to Opposers’ alleged rights in the mark and their interest in asserting those rights nor have they requested that third-parties cease and desist with the use of the Mark that they purport to have rights to in this Notice of Opposition. Opposers are aware of third-party use as the reports of third-parties using the “Cronut” term have been publically referenced in the press, yet, *the only time* Opposers have sought to assert any claim or right to the Mark was after it became famous and only then with the singular purpose of usurping the proper rights of the Applicants—Opposers have failed to address any other third-party in the policing of this mark.

Applicants hereby give notice that they may rely on any other defenses that may become available or appear proper during discovery, and hereby reserve their right to amend this Answer to assert any such defenses.

Applicants hereby appoint Candice S. Cook, a member of the Bars of the State of New York and Texas at the firm The Cook Law Group PLLC/ 77 Water Street, 8<sup>th</sup> FL/ New York, New York 10005/ Tel: TEL: (646) 722-4166/ Email: [csc@ca-coglobalinc.com](mailto:csc@ca-coglobalinc.com), [and Leslie J. Lott, a member of the Bar of the State of Florida, Ury Fischer, a member of the Bar of the State of Florida, and Noah H. Rashkind, a member of the Bar of the State of Florida, at the firm Lott & Fischer, P.L., 355 Alhambra Circle, Suite 1100, Miami, Florida 33134, \(Telephone: 305-448-7089\), E-mails: \[ljlott@lottfischer.com\]\(mailto:ljlott@lottfischer.com\), \[ufischer@lottfischer.com\]\(mailto:ufischer@lottfischer.com\), and \[nrashkind@lottfischer.com\]\(mailto:nrashkind@lottfischer.com\)](#), to act as attorneys in the matter of the opposition identified above, to prosecute said opposition, to transact all business in the Patent and Trademark Office, and in the United States courts connected with the opposition, to sign ~~her~~his or her name to all papers which are hereinafter to be filed in connection therewith, and to receive all communications relating to the same.

WHEREFORE, Applicants request that the Trademark Trial and Appeal Board deny and dismiss the Opposition and grant all other appropriate relief to Applicants as it deems just. Applicants pray as follows:

- (a) this opposition be dismissed;
- (b) that pending applications with the registration Nos. 86008577 and 85961168 be cancelled and/or denied; and
- (c) permit registration of Applicants' proposed mark in Application Serial Number 85936327 in the United States Patent and Trademark Office.

(e) *[signature on following page]*

Dated this \_\_\_\_\_ of November, 2014 April, 2015.

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~~ATTORNEY FOR INTERNATIONAL PASTRY CONCEPTS, LLC AND DOMINIQUE ANSEL~~

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the ANSWER TO NOTICE OF OPPOSITION, AND AFFIRMATIVE DEFENSES was served on Counsel for Opposer by certified mail and first-class mail at the address below:

Robert B.G. Horowitz  
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Dated: \_\_\_\_\_ By: \_\_\_\_\_

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INTERNATIONAL PASTRY  
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DOMINIQUE ANSEL

**CERTIFICATE OF ELECTRONIC FILING**

The undersigned certifies that this submission (along with any paper referred to as being attached or enclosed) is being filed with the United States Patent and Trademark Office via the Electronic System for Trademark Trials and Appeals (ESTTA) on this \_\_\_\_\_ of NOVEMBER, 2014.

Dated: \_\_\_\_\_ By: \_\_\_\_\_

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Date: April 23, 2015.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the foregoing document is being served upon Opposers by delivering a true and correct copy of same to counsel for Opposers via U.S. Mail and a courtesy copy by electronic mail on April 23, 2015 as follows:

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Mark: **CRONUT**

**APPLICANTS' AMENDED ANSWER TO SECOND AMENDED NOTICE OF  
OPPOSITION AND AFFIRMATIVE DEFENSES**

The following is the Amended Answer of Applicants International Pastry Concepts LLC and Dominique Ansel (collectively, "Applicants"), owner of Federal Trademark Application Serial No. 85936327 for the mark CRONUT (hereinafter "CRONUT," "Applicants' Mark" or "Mark"), by and through Counsel, Candice S. Cook for The Cook Law Group, PLLC, and Leslie J. Lott, Ury Fischer, and Noah H. Rashkind of Lott & Fischer, P.L., to Opposers' Second Amended Notice of Opposition (hereinafter "Notice of Opposition") filed on October 23, 2014 by Najat Kaanache and Crystalline Management, LLC (hereinafter "Opposers"). Applicants hereby reply to the numbered grounds for opposition set forth in the Notice of Opposition as follows:

1. Applicants deny each and every allegation contained in ¶ 1 of the Notice of Opposition.

The term CRONUT in class 30 was created by Dominique Ansel at his bakery located at 189 Spring Street in New York City on May 10, 2013. An Exhibit in support of this fact is attached as Exhibit 1.

2. Denied.
3. Admit.

4. Admit.
5. Answering ¶ 5 of the Notice of Opposition, Applicants admit that they are seeking the registration of the trademark CRONUT and that Opposers' subsequent registration—which was filed after the extensive global media coverage of Applicants' trademark application and which followed the widely covered success and fame of Applicants' original pastry product—is substantially identical to Applicants' mark, but otherwise deny each and every allegation contained therein.
6. Applicants admit that their trademark application for CRONUT encompasses doughnuts, but otherwise deny each and every allegation in ¶ 6 of the Notice of Opposition.
7. Applicants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 7 of the Notice of Opposition—specifically, whether “the goods set forth in Applicants' CRONUT application are or will be advertised, promoted, sold, and distributed to customers who are the same customers to which Opposers said CRONUTS donuts are advertised and sold.” Since Applicants can neither admit nor deny the allegations as written, Applicants therefore deny the allegations.
8. Applicants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 8 of the Notice of Opposition. Since Applicants can neither admit nor deny the allegations as written, Applicants therefore deny the allegations.
9. Denied.
10. Denied.
11. Denied.
12. Applicants repeat and reallege paragraphs 1 through 11 hereof as though fully set forth herein. Applicants also submit and present to the panel that on October 3, 2014, the

Trademark Trial and Appeal Board dismissed Opposers' descriptiveness claims in its holding of Applicants' Motion to Dismiss. Accordingly, Applicants object to Opposers' attempt to re-enter the descriptiveness claim into the record and as an issue in this action.

13. Applicants admit that the term CRONUT refers to the hybrid donut/croissant pastry created by Chef Dominique Ansel and sold at his bakery in New York and around the United States of America. See Exhibit 2.

14. Denied. See Exhibit 3.

15. Denied. See Exhibit 3.

16. Denied. See Exhibit 3.

17. Denied. See Exhibit 3.

18. Denied.

19. Applicants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶ 19 and therefore deny these allegations.

20. Denied.

21. Denied.

22. Applicants repeat and reallege paragraphs 1 through 21 hereof as though fully set forth herein.

23. Denied.

24. Denied.

25. Applicants repeat and reallege paragraphs 1 through 24 hereof as though fully set forth herein.

26. Admit.

27. Admit.

28. Applicants admit to their counsel's use of the ™ symbol in correspondence sent to Opposers' counsel to address Opposers' infringement of Applicants' rights. Since Applicants can neither admit nor deny further the paragraph as written, Applicants deny the remaining allegations.
29. Denied. Applicants utilized the ® only after receiving the Registration Certificate from the USPTO and subsequently made a good faith effort to remove the registration symbol from bakery materials upon learning of the clerical error at the USPTO. In fact, Opposers' own Exhibit 1 attached to their Notice of Opposition illustrates that in the tag line and heading of the website where Applicants seek to inform and educate customers about the CRONUT pastry—titled Cronut 101—Applicants are using the ™ and **NOT** the ®. A true and correct copy of Applicants' website dated October 31, 2014 is attached as Exhibit 4.
30. Denied.
31. Applicants repeat and reallege paragraphs 1-30 hereof as though fully set forth herein.
32. Admit.
33. Denied.
34. Denied.
35. Denied.
36. Denied.
37. Denied.
38. Denied.
39. Denied.

## **AFFIRMATIVE DEFENSES**

Applicants assert that the following affirmative defenses bar Opposers' requested relief in their Second Amended Notice of Opposition.

### **FIRST AFFIRMATIVE DEFENSE—Failure to State a Claim**

Opposers' fail to state a claim upon which relief may be granted.

### **SECOND AFFIRMATIVE DEFENSE—Laches, Waiver, Acquiescence, & Estoppel**

Applicants have been using the Mark and developing consumer recognition and goodwill therein since at least May 10, 2013, such use being open, notorious, and known to Opposers and such knowledge, in turn, being known to Applicants. During this time, Opposers failed to take *any* action to assert the claims on which they base their Opposition, on which inaction Applicants have relied to their detriment. Opposers' claims are consequently barred by the doctrines and equitable defenses of laches, waiver, acquiescence, and estoppel.

### **THIRD AFFIRMATIVE DEFENSE—Lack of Standing**

Opposers lack standing to assert claims surrounding the CRONUTS trademark. Opposers have not established title to the mark CRONUTS and have failed to establish a real interest and reasonable belief for an equal right to use the mark for goods. *Zero* evidence was submitted with this Notice of Opposition to illustrate *any* prior usage of the term CRONUTS and more specifically, any prior usage of the term Cronuts in Class 30. Crystalline Management has not asserted any facts to support or illustrate *any* relationship, use, or title to the mark CRONUTS or this Notice of Opposition. Najat Kaanache is a former chef at Private Social—an establishment that has since closed and, thus, is no longer in business. Opposers have failed to illustrate any intellectual property rights in CRONUTS. Accordingly, they lack standing to assert any claims via the Notice of Opposition.

#### **FOURTH AFFIRMATIVE DEFENSE—Unclean Hands**

Opposers have unclean hands. On or around June 10, 2013, Opposers engaged in drastic and overt measures to intentionally and wrongfully divert Applicants' customers, fans, and professional colleagues through actions intended to cause consumer confusion, including *inter alia*, by the use of the same Mark. It was not until Dominique Ansel received fame and monetary success from his original CRONUT pastry creation that Opposers' sought to a) trademark the term CRONUTS; b) resurrect an appetizer that it had discontinued and which was undeniably *unrelated to a hybrid croissant doughnut pastry* and was in fact a crawfish croquette on some days and a crab patty on others; c) change the entire formulation of its previous croquette in an attempt to directly mimic the Applicants' unique creation in a dubious effort to bamboozle both the USPTO and customers; and d) file for classification with the USPTO under International Class 30 *after* Dominique Ansel filed for trademark registration of the name CRONUT, despite the fact that the Opposers' alleged product had been discontinued from its menu and was a seafood product that—if it were to be trademarked at all—belonged in International Class 29. Opposers have also altered the product configuration of their product to more closely resemble Applicants in a bad faith effort *to cause* the exact likelihood of confusion that Opposers now allege in this Notice of Opposition. Opposers' only goals in these efforts have been to hijack the rightful trademark ownership rights from Dominique Ansel and to serve as “trademark trolls” in an unscrupulous attempt to preclude Dominique Ansel from receiving his rightful federal trademark protection.

#### **FIFTH AFFIRMATIVE DEFENSE--Fraud**

Opposers have conducted and continue to engage in fraudulent behavior as it pertains to the CRONUTS trademark. Opposers have stated to the United States Patent and Trademark Office

and to the press that they created CRONUTS as a contraction for “creative doughnuts”—despite the absence of ANY EVIDENCE in support of Opposers’ assertions. The CRONUTS allegedly sold by Opposers were not doughnuts, but croquettes made of fish—a food item that belongs in a different class of goods and which Opposers knew were not to be classified under Class 30 and certainly were not “creative doughnuts”.

Opposers alleged CRONUTS were briefly sold as appetizers, were classified as croquettes, and were *never identified* as creative doughnuts. Opposers have not had continuous usage of the name CRONUTS and discontinued the item on their menu until learning of Applicants’ famous pastry. Yet, after Opposers discontinued the alleged CRONUTS, and after the success, fame, and press surrounding Dominique Ansel, Opposers resurrected their crawfish product and subsequently and significantly changed the product aesthetically and via the recipe to attempt a blatant replication of Dominique Ansel’s unique creation including the material misrepresentation to the press and the USPTO that they were the priority users of the name CRONUTS. Opposers’ statements and representations to the USPTO are not true. Opposers’ ongoing deception and material misrepresentations to the United States Trademark and Patent Office has not ended with this Notice of Opposition, but has continued via their attempts to procure CRONUTS applications in other categories—again in an effort to leach off of the success of Award Winning Chef, Dominique Ansel.

Opposers have sought to move additional “CRONUTS” related applications forward in the books category despite initiating the adjudication of these marks before the panel and with knowledge that a pending application for Mr. Ansel is before the USPTO in the same category. Even within the content of this Notice of Opposition, blatant misrepresentations have been submitted in an effort to needlessly delay, distract, and misrepresent the truth to this panel.

Opposers' own media references included within their Notice of Opposition support the registration of the CRONUT mark for Dominique Ansel and cite his innovation, creativity, and responsibility for the creation of the distinct pastry, the Cronut pastry. Yet, Opposers' fraudulently have sought to play fast and loose with the facts, the truth, and the USPTO's time. Applicants and the USPTO have relied and continue to rely on Opposers' representations to both the USPTO's and Applicants' detriment and the Opposers' continuous fraudulent behavior should not be rewarded.

#### **SIXTH AFFIRMATIVE DEFENSE—Abandonment/Non-use**

Applicants are responsible for the creation, introduction, and invention of the CRONUT pastry, but even if Opposers' allegations in the Notice of Opposition were true, Opposers are barred from relief under the doctrines of abandonment/non-use. Opposers have stated to the press that they first used the term CRONUTS as an item on a menu for the restaurant Private Social in Dallas, Texas. However, Opposers stopped using the name CRONUTS to describe its appetizer in spring of 2013 when they changed the menu at Private Social and advertised a new permanent "Awesome Texas Food" menu. Opposers removed CRONUTS from the menu thereby ceasing to both serve and sell them. Opposers had no intention of using the name "CRONUT" again or resuming use in any fashion—that is, until Applicant Dominique Ansel independently created his unique pastry across the country, created the name CRONUT pastry for his hybrid croissant/doughnut pastry, registered to trademark the name, gained fame and accolades for his inventiveness, and Opposers decided to capitalize off of his success. Prior to Applicants' fame and the success of Dominique Ansel's CRONUT pastry, Opposers had stopped using the name CRONUT as a description on its menu for seafood croquettes with no intention of using it again. Accordingly, they are barred from relief.

### **SEVENTH AFFIRMATIVE DEFENSE—Failure To Police The Trademark**

Opposers are barred from relief because Opposers have failed to police their alleged rights in the CRONUT trademark. Although Applicants assert that Opposers never used the Mark as a source identifier when it was an alleged menu item in Texas, even if they did, upon information and belief, Opposers have failed to effectively police its trademark against confusing or similar marks. In fact, upon information and belief, Opposers have failed to police the mark at all. Upon information and belief, Opposers have neglected to send demand letters to any third-parties alerting them to Opposers' alleged rights in the mark and their interest in asserting those rights nor have they requested that third-parties cease and desist with the use of the Mark that they purport to have rights to in this Notice of Opposition. Opposers are aware of third-party use as the reports of third-parties using the "Cronut" term have been publically referenced in the press, yet, *the only time* Opposers have sought to assert any claim or right to the Mark was after it became famous and only then with the singular purpose of usurping the proper rights of the Applicants—Opposers have failed to address any other third-party in the policing of this mark.

Applicants hereby give notice that they may rely on any other defenses that may become available or appear proper during discovery, and hereby reserve their right to amend this Answer to assert any such defenses.

Applicants hereby appoint Candice S. Cook, a member of the Bars of the State of New York and Texas at the firm The Cook Law Group PLLC/ 77 Water Street, 8<sup>th</sup> FL/ New York, New York 10005/ Tel: TEL: (646) 722-4166/ Email: csc@ca-coglobalinc.com, and Leslie J. Lott, a member of the Bar of the State of Florida, Ury Fischer, a member of the Bar of the State of Florida, and Noah H. Rashkind, a member of the Bar of the State of Florida, at the firm Lott & Fischer, P.L., 355 Alhambra Circle, Suite 1100, Miami, Florida 33134 (Telephone: 305-448-

7089), E-mails: ljlott@lottfischer.com, ufischer@lottfischer.com, and nrashkind@lottfischer.com, to act as attorneys in the matter of the opposition identified above, to prosecute said opposition, to transact all business in the Patent and Trademark Office, and in the United States courts connected with the opposition, to sign his or her name to all papers which are hereinafter to be filed in connection therewith, and to receive all communications relating to the same.

WHEREFORE, Applicants request that the Trademark Trial and Appeal Board deny and dismiss the Opposition and grant all other appropriate relief to Applicants as it deems just. Applicants pray as follows:

- (a) this opposition be dismissed;
- (b) that pending applications with the registration Nos. 86008577 and 85961168 be cancelled and/or denied; and
- (c) permit registration of Applicants' proposed mark in Application Serial Number 85936327 in the United States Patent and Trademark Office.

*[signature on following page]*

Date: April 23, 2015

Respectfully submitted,

**LOTT & FISCHER, PL**

s/Noah H. Rashkind/

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*Attorneys for Applicants  
International Pastry Concepts, LLC and  
Dominique Ansel*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the foregoing document is being served upon Opposers by delivering a true and correct copy of same to counsel for Opposers via U.S. Mail and a courtesy copy by electronic mail on April 23, 2015 as follows:

Robert B. G. Horowitz, Esquire  
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Telephone: (212) 589-4200

*Attorneys for Opposer  
Crystalline Management LLC and Najat Kaanache*

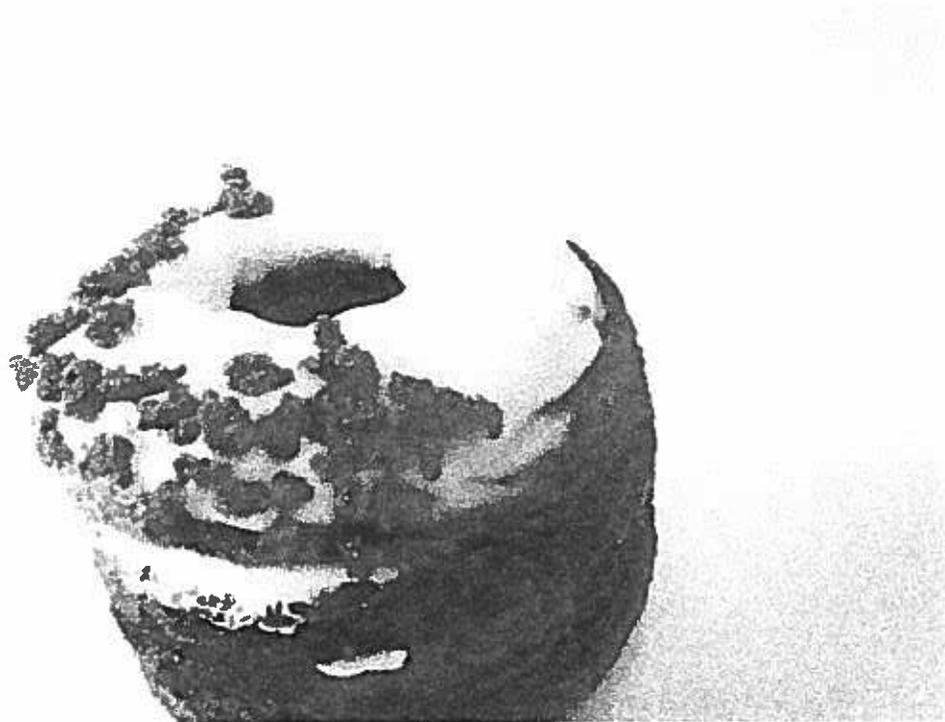
s/Noah H. Rashkind/  
Noah H. Rashkind

**EXHIBIT 1**

Engines of Innovation | May 9, 2013 2:10 p.m.

## Introducing the Cronut, a Doughnut-Croissant Hybrid That May Very Well Change Your Life

By Hugh Merwin



Beneath this rose glaze lies some pretty genius pastry engineering. Photo: Courtesy of Dominique Ansel Bakery

Starting tomorrow, this round, glazed thing you see before you will be added to the permanent collection at **Dominique Ansel Bakery**. Because it's part croissant and part doughnut, the pastry chef is, appropriately, calling it a cronut. (Go ahead, say *cwaahh*-nut, you know, French style.) Each one of these puppies is made from pastry dough that's been sheeted, laminated, proofed, then fried like a doughnut and rolled in flavored sugar. But that's not all: Cronuts-to-be are also filled with a not-so-sweet Tahitian vanilla cream, given a fresh coat of rose glaze, and bedazzled with rose sugar. Got it? Good. Let's briefly examine the sheer implausibility and engineering genius that goes into each one of these things.

First off, call your friendly neighborhood pastry chef and ask him or her what happens when you try to fry croissant dough. It's not pretty. Even if the laminated layers don't separate instantly and part ways in the hot oil six ways to Sunday, chances are that yeast-leavened dough will have a lumpy, sad, and uneven ascent before it ever gets to the golden brown stage. Ansel says it took around ten recipes and adjustments to multiple variables of time and temperature before he found a special trick to sheeting the dough, then learning to fry it in grapeseed oil at one specific (and somewhat secret) temperature.

The fried cronut looks like this on the inside:



Don't flake out. *Photo: Courtesy of Dominique Ansel Bakery*

To finish, it's filled with cream, another feat that's also a bit difficult to pull off in a pastry that has a punched-out center hole. The finished cronut tastes a lot like a classic glazed doughnut, but pretty much more awesome, and its layers peel apart like those in a mille crepe cake.\*

Ansel's ongoing work with **religieuses** and his reinvention of the **fraisier** already had us convinced that the pastry chef routinely dares to dream at his Soho shop and is never content to rest on his macarons (though those are also very good), but this is just sort of nuts. It's a bold step forward for pastry.

Cronuts are \$5.00 apiece and go on sale tomorrow at the bakery, just in time for Mother's Day. Flavors will change: Next month's cronut will have lemon maple glaze, maple syrup cream, and slightly salted sugar on the sides.

***Dominique Ansel Bakery, 189 Spring St., nr. Thompson St.; 212-219-2773***

**Earlier: Anatomy of a Cake: Will Cotton and Dominique Ansel's Fraisier Debuts in Soho**

***\*: It should be noted that cronuts do not share any pastry DNA with members of the endangered cupcake family.***

11/5/2014

Introducing the Cronut, a Doughnut-Croissant Hybrid That May Very Well Change Your Life -- Grub Street

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**EXHIBIT 2**

# EATER

City **NEW YORK**

TOP STORIES

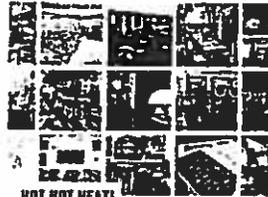
PLACES

JOBS



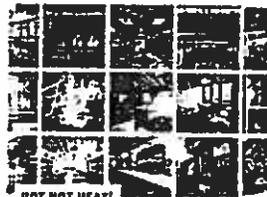
EATER INSIDE

Quality Italian Just Keeps Going and Going and Going



HOT HOT HEAT!

The Queens Heatmap: Where to Eat Right Now



HOT HOT HEAT!

The Brooklyn Heatmap: Where to Eat Right Now



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## CRONUT MANIA

### This Morning's Cronut Line Was One for the Record Books

Friday, August 2, 2013, by Greg Morabito



Photo: Instagram/kristinavanni

People have been lining up to buy Cronuts since May, when Dominique Ansel first introduced the delicious croissant-doughnut hybrid at his Soho bakery. At first the lines stretched west, then Dominique shifted the line to the east, and then it started curling around the Thompson Street Playground. But this morning, the line stretched past the park, and soon it might even cross Prince Street.



SOHO

CRONUT MANIA

CRONUTS

DOMINIQUE ANSEL

DOMINIQUE ANSEL BAKERY

TOP

27 COMMENTS

Switch

EATER DATING SEE MORE DATES →



66 HOW ABOUT WE...  
drink sugaria and swap travel stories.

#### NEW LISTINGS AT EATER JOI

- Sous Chef at the girl & the fig
- Executive Chef at Cullen's

#### FOLLOW EATER NY

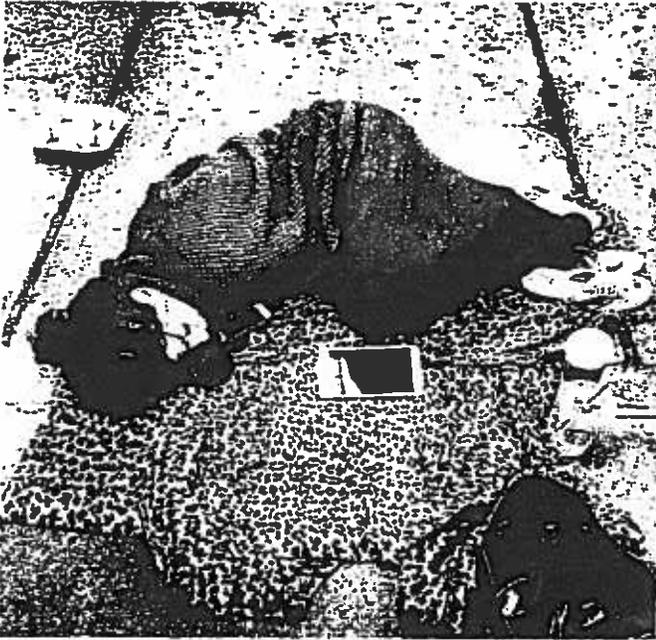
#### WHERE TO EAT

- Eater's 38 Top Restaurants [MAP](#)
- Heatmap: Where to Eat in Manhattan [MAP](#)
- Heatmap: Where to Eat in Brooklyn [MAP](#)
- Heatmap: Where to Eat in Queens [MAP](#)
- Heatmap: Where to Drink Cocktails [MAP](#)
- Heatmap: Where to Drink Wine [MAP](#)
- Heatmap: Where to Eat Brunch [MAP](#)
- Robert Sietsema's Neighborhood Guides
- New York's Michelin Stars [MAP](#)
- New York's Underrated Restaurants [MAP](#)
- New York's Best Drunk Food [MAP](#)
- New York's Best Late Night Specials [MAP](#)
- New York's Best New Business Lunches [MAP](#)
- A Guide to New York's Secret Restaurants

Dominique Ansel's recent appearance on *Late Night with Jimmy Fallon* might have something to do with this.

In other Cronut news, Ansel is now selling a "Crolanthropy" t-shirt, with proceeds going to benefit the Food Bank For New York City. If you wear this shirt in the Cronut line, you can buy twice as many Cronuts as the average customer, and buying one shirt will feed 50 New Yorkers. Good deal, all around.

Here are more pics of this morning's insane line.



[Photo: Instagram/AmandaFaymous]



[Photo: Instagram/Marsgirrr]

- A Guide to New York's Secret Bars
- Where to Eat at John F. Kennedy Airport
- Where to Eat at LaGuardia Airport
- Where to Eat at Newark Liberty Airport



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### NEWS BY NEIGHBORHOOD

#### MANHATTAN

- Chelsea
- Chinatown
- East Harlem
- East Village
- FIDI/Battery Park City
- Flatiron District
- Garment District
- Gramercy
- Greenwich Village
- Harlem/M'side Heights
- Hell's Kitchen/Clinton
- Hudson Square
- Inwood/Wash. Heights
- Lower East Side
- Meatpacking District
- Midtown
- Midtown East/Kips Bay
- Murray Hill
- Noho/Central Village
- NoIta
- Roosevelt Island
- Soho
- Times Square
- Tribeca
- Union Square
- Upper East Side
- Upper West Side
- West Chelsea
- West Village

#### BROOKLYN

#### QUEENS

### TIPPING IS CUSTOMARY

[tips@eater.com](mailto:tips@eater.com)

### ADVERTISE WITH US

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### MONTHLY ARCHIVES

Select month...

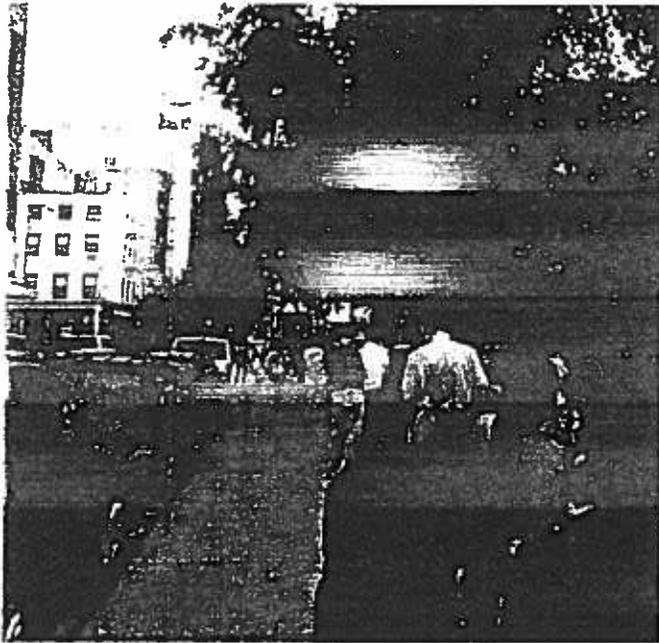
All archives

### FROM OUR PARTNERS

Taste the Rainbow: Veggie-Filled Spring Rolls

Dessert Doesn't Get Much Better Than This Summer Fruit Cobbler

Is the Ramen Burger the New Cronut?



[Photo: Twitter/shelbs82]

Sweet and Spicy Canded Nuts

- Philadelphians Really Miss Restaurant's Old, Racist Name
- Seamless-GrubHub Delivery Juggernaut Agrees to End Exclusivity Arrangement
- Cops Responding to Coffee Store Robbery Dislike Worst-Planned Film Shoot Ever
- Stomach Virus Linked to Bagged Salad at Olive Garden and Red Lobster



### PREFERENCES

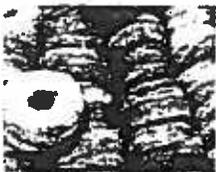
- Open external links in new tabs?



[Photo: Instagram/misnicoleataei]

All Coverage of Cronuts (-ENY-)

### RELATED LINKS



Cronut Mania



Healthy Sunless Tanner Putting Tanning Salons Out Of Business  
Tan Physics



Balthazar Is Closed and We're all Doomed



Going... Going... Gone! iPads for Under \$40? QuiBids



**EXHIBIT 3**

The chart below demonstrates that the articles Opposers submitted in paragraphs 14-17 in their Second Amended Notice of Opposition goes counter to their claims and instead confirms that Dominique Ansel invented the Cronut pastry. Specifically, the chart identifies specific quotes from the Opposers' own article submissions, virtually all of which expressly state that Dominique Ansel created the Cronut pastry. The chart also includes quotes that show that the mark "Cronut" is synonymous with Dominique Ansel's unique and distinctive hybrid of croissant and doughnut—not Opposers' sweet and savory doughnuts. The evidence will be referenced as follows: (1) source of the document; (2) title of the article, blog, video or web page; (3) web address; and (4) date of publication if the accurate date is available for reference.

Source	Title	Web Address	Date	Quote(s)
Mail Online	<p>Make your own Cronuts: DIY manual allows food-craze fans to avoid the lines by making their own sugary treats at home</p> <ul style="list-style-type: none"> <li>• The always-sold-out pastries can now be made from the comfort of your own kitchen</li> <li>• Invented by baker Dominique Ansel, cronut fans have taken over SoHo standing on line for hours</li> <li>• They have even spawned an underground baked goods-based economy</li> </ul>	<p><a href="http://www.dailymail.co.uk/news/article-2389350/Cronut-recipe-Avoid-lines-stay-home-Cronuts-masses.html">http://www.dailymail.co.uk/news/article-2389350/Cronut-recipe-Avoid-lines-stay-home-Cronuts-masses.html</a></p>	8/11/2013	<p>"First sold by the Dominique Ansel Bakery in New York, the croissant-doughnut that took over the city's SoHo neighborhood earlier this year can now be made from the comfort of your own kitchen..."</p> <p>"Invented by French baker Dominique Ansel and sold at his SoHo bakery since June, cronuts fans spend hours each morning on line to buy the famous pastries - which usually sell out shortly after the bakery's 8am opening.</p> <p>Cronuts have even spawned an underground economy, with pricey delivery services springing up on Craigslist."</p>

Source	Title	Web Address	Date	Quote(s)
Blog "Sorted Food"	How To Make Cronuts	<a href="https://sortedfood.com/recipe=2558">https://sortedfood.com/recipe=2558</a>	Unknown from Cite	"Cronuts are a mix between a croissant and a doughnut/donut, and are the most gorgeous sweet treats that have been taking over Manhattan and London for the last couple of months! Dominique Ansel may have started them..."
Blog "About Food"	DIY Homemade Cronuts	<a href="http://gourmetfood.about.com/od/dessertrecipes/r/Diy-Homemade-Cronuts.htm">http://gourmetfood.about.com/od/dessertrecipes/r/Diy-Homemade-Cronuts.htm</a>	Unknown from cite	"The original Cronut was invented by Chef Dominique Ansel in his New York bakery."
Wikihow	How To Make Cronuts	<a href="http://www.wikihow.com/Make-Cronuts">http://www.wikihow.com/Make-Cronuts</a>	Unknown from cite	"A cronut is a crazy, delicious hybrid between a croissant and donut."

**EXHIBIT 4**

# DOMINIQUE ANSEL BAKERY



Online Boutique



October 2014

Su	Mo	Tu	We	Th	Fr	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

4:39:22 PM  
10/01/2014



# DOMINIQUE ANSEL BAKERY



Follow us on Instagram @dominiqueanselbakery

Online boutique



The Moon



The Moon