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

Proceeding	91217033
Party	Defendant DOOYEON Corp.
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Submission	Answer
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Trademark  
Mark: KICHO with design  
Serial No. 86/053,930  
Filed on September 3, 2013  
Published on February 25, 2014

KIKO S.r.L.	)	
	)	
	)	
	)	
v.	)	Opposition No. 91217033
	)	
DOOYEON CORP.	)	
	)	
	)	
	)	

**APPLICANT'S ANSWER AND AFFIRMATIVE DEFENSES TO OPPOSITION**

Applicant, DOOYEON CORP., upon present knowledge and belief, hereby files its Answer and Affirmative Defenses to the Opposition filed by Opposer, KIKO S.r.L., Inc., and states as follows.

The unnumbered prefatory statements set forth in the Notice of Opposition are not believed to require a response. To the extent that they may be construed to require a response the same are denied.

**ANSWER**

1. Applicant admits the allegations of paragraph 1.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2, and therefore denies same.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3, and therefore denies same.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 4, and therefore denies same.
5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5, and therefore denies same.
6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 6, and therefore denies same.
7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 7, and therefore denies same.
8. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8, and therefore denies same.
9. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9, and therefore denies same.
10. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9, and therefore denies same.
11. Applicant denies the allegations of paragraph 11.
12. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 12, and therefore denies same.
13. Applicant denies the allegations of paragraph 13.
14. Applicant would state that the public record speaks for itself, the recited matter is not binding upon the parties hereto with respect to the adjudication of the current issues presented in this case, and denies the remainder of the allegations of paragraph 14.
15. Applicant admits the allegations of paragraph 15.
16. Applicant denies the allegations of paragraph 16.
17. Applicant denies the allegations of paragraph 17.

18. Applicant further denies each, every, and all of the remaining allegations asserted by Opposer in all counts and/or paragraphs of the Notice of Opposition which are not expressly admitted to be true herein.

#### **ADDITIONAL DEFENSES**

1. The Notice of Opposition fails to state a claim upon which relief may be granted.
2. There is no likelihood of confusion between the marks cited in the Notice of Opposition and Applicant's mark because the marks cited in the Notice of Opposition and Applicant's mark are not confusingly similar to each other to create a likelihood of confusion in the marketplace.
3. Opposer will not be harmed by Applicant's registration and therefore lacks standing to oppose the subject Application.
4. Applicant specifically reserves the right to amend its Answer to assert such additional Affirmative Defenses or counterclaim as may be found to be applicable through or following discovery in this Opposition.

ACCORDINGLY, Applicant respectfully requests that the Board enter judgment in Applicant's favor, dismiss the Notice of Opposition with prejudice, and grant all other relief to which Applicant is entitled.

Dated: August 1, 2014

Respectfully submitted,  
/s/ JONG H PARK  
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of "APPLICANT'S ANSWER AND AFFIRMATIVE DEFENSES TO OPPOSITION" was sent by US First Class mail, postage prepaid, on 08/01/2014 to

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