

ESTTA Tracking number: **ESTTA627389**

Filing date: **09/16/2014**

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

|                           |   |
|---------------------------|---|
| Proceeding                | 91217754  |
| Party                     | Defendant<br>SON, SAMMY S   |
| Correspondence<br>Address | STOREPLAN USA CORPORATION<br>STOREPLAN USA CORPORATION<br>21023 MAIN ST STE A<br>CARSON, CA 90745-1246<br><br>syang@stblueca.com;info@storeplanusa.co |
| Submission                | Answer  |
| Filer's Name              | Matthew Seror   |
| Filer's e-mail            | mseror@buchalter.com  |
| Signature                 | /matthew seror/   |
| Date                      | 09/16/2014  |
| Attachments               | Storeplan Opp. Answer.pdf(16519 bytes )   |

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

In the matter of Trademark Application Serial Number 86/141,864  
For the Mark: **OKRUMONG**  
Published for Opposition on July 1, 2014

STOREPLAN USA CORPORATION,

Opposer;

v.

SAMMY S. SON,

Applicant.

Opposition No.: 91217754

Application No. 86/141,864

Mark: Okrumong

Published for Opposition: July 1, 2014

**Applicant's Answer to Notice of Opposition**

Sammy S. Son (the "Applicant"), by its undersigned counsel of record, hereby responds to the Notice of Opposition as filed by Storeplan USA Corporation (the "Opposer") on August 7, 2014 opposing registration of Application Serial No. 86/142,210 (the "Opposition"). Applicant responds to the Opposition as follows:

In response to the introductory paragraph contained in the Opposition, Applicant is without sufficient knowledge and information to form a belief as to the first sentence of this introductory Paragraph, and on that basis denies the allegations contained therein. Applicant denies the remaining allegations contained in this Paragraph.

1. Applicant is without sufficient knowledge and information to form a belief as to the allegations of Paragraph 1 and Applicant therefore denies the allegations thereof.
2. Applicant denies the allegations contained in Paragraph 2 of the Opposition.
3. Applicant denies the allegations contained in Paragraph 3 of the Opposition.
4. Applicant denies the allegations contained in Paragraph 4 of the Opposition.
5. Applicant admits that the document attached to the Opposition as Exhibit "A" reflects a printout from the TTAB website for Serial No. 86/142,210.
6. Applicant admits that the document attached to the Opposition as Exhibit "B" reflects a printout from the TTAB website for Serial No. 86/141,864.
7. Applicant denies the allegations contained in Paragraph 7 of the Opposition.
8. Applicant denies the allegations contained in Paragraph 8 of the Opposition.
9. Applicant denies the allegations contained in Paragraph 9 of the Opposition.



**Proof of Service**

I hereby certify that a true and correct copy of the instant Answer to Notice of Opposition has been served on the Attorney of Record for Storeplan USA Corporation via First Class Mail.

By: \_\_\_\_\_/mls/\_\_\_\_\_  
Matthew L. Seror

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

In the matter of Trademark Application Serial Number 86/142,210

For the Mark: **OKRUMONG**

Published for Opposition on June 10, 2014

STOREPLAN USA CORPORATION,

Opposer;

v.

SAMMY S. SON,

Applicant.

Opposition No.: 91217754

Application No. 86/142,210

Mark: Okrumong

Published for Opposition: June 10, 2014

**Applicant's Answer to Notice of Opposition**

Sammy S. Son (the "Applicant"), by its undersigned counsel of record, hereby responds to the Notice of Opposition as filed by Storeplan USA Corporation (the "Opposer") on August 7, 2014 opposing registration of Application Serial No. 86/142,210 (the "Opposition"). Applicant responds to the Opposition as follows:

In response to the introductory paragraph contained in the Opposition, Applicant is without sufficient knowledge and information to form a belief as to the first sentence of this introductory Paragraph, and on that basis denies the allegations contained therein. Applicant denies the remaining allegations contained in this Paragraph.

4. Applicant is without sufficient knowledge and information to form a belief as to the allegations of Paragraph 1 and Applicant therefore denies the allegations thereof.

5. Applicant denies the allegations contained in Paragraph 2 of the Opposition.

6. Applicant denies the allegations contained in Paragraph 3 of the Opposition.

7. Applicant denies the allegations contained in Paragraph 4 of the Opposition.

8. Applicant admits that the document attached to the Opposition as Exhibit "A" reflects a printout from the TTAB website for Serial No. 86/142,210.

9. Applicant admits that the document attached to the Opposition as Exhibit "B" reflects a printout from the TTAB website for Serial No. 86/141,864.

10. Applicant denies the allegations contained in Paragraph 7 of the Opposition.

11. Applicant denies the allegations contained in Paragraph 8 of the Opposition.



Attorneys for Applicant  
Sammy S. Son

**Proof of Service**

I hereby certify that a true and correct copy of the instant Answer to Notice of Opposition has been served on the Attorney of Record for Storeplan USA Corporation via First Class Mail.

By: \_\_\_\_\_/mls/\_\_\_\_\_  
Matthew L. Seror