

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

**In the Matter of Serial No: 86/191,607 for the Trademark
application L.A. Beach and Design**

L.A. Beach 

("Applicant's Mark")

L.A. GEAR, INC,)	Opposition No. 91217968
)	
Opposer,)	Serial No. 86/191,607
)	
vs.)	ANSWER TO OPPOSER'S
)	NOTICE OF OPPOSITION
CELINE LEGEY-SALISIAN,)	
)	
Applicant.)	

CELINE LEGEY-SALISIAN ("Applicant") answers LA. GEAR, INC.'S
("Opposer") Notice of Opposition as follows:

1. Applicant admits the allegations contained in Paragraph 1 of the Notice of Opposition.
2. Applicant has insufficient information to answer Paragraph 2 of the Notice of Opposition and, based thereon, denies said Paragraph.
3. Applicant admits the allegations contained in Paragraphs 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13,14, and 15 of the Notice of Opposition.
4. Applicant has insufficient information to answer Paragraph 16 of the Notice of Opposition and, based thereon, denies said Paragraph.



09-25-2014

5. Applicant admits the allegations contained in Paragraphs 17, 18, 19, and 20 of the Notice of Opposition.
6. Applicant denies the allegations contained in Paragraph 21 of the Notice of Opposition as to the mark and design "L.A."
7. Applicant generally admits the allegations contained in Paragraph 22 of the Notice of Opposition, but denies that Applicant's Mark was to be used in all International Class 18 and Class 25 products.
8. Applicant denies the allegations contained in Paragraph 23 of the Notice of Opposition.
9. Applicant admits the allegations contained in Paragraphs 24, 25 and 26 of the Notice of Opposition.
10. Applicant denies the allegations contained in Paragraph 27 of the Notice of Opposition.
11. Applicant admits the allegations contained in Paragraph 28 of the Notice of Opposition.
12. Applicant denies the allegations contained in Paragraphs 29, 30, 31, 32, 33, 34, 35 and 36 of the Notice of Opposition.

FIRST AFFIRMATIVE DEFENSE

Equitable Estoppel

13. Opposer alleges that Applicant's Mark is "confusingly similar to the mark of Opposer identified in the attached Exhibits 1-19." The only part of Applicant's Mark that is similar to Opposer's Marks is the wording "L.A.". On any number of the Exhibits Opposer has attached to the Notice of Opposition, wording is contained that "No claim is made to the exclusive right to use 'L.A.'; apart from the mark as shown."
14. The word "Beach", set forth in Applicant's Mark, does not appear on any of Opposer's Marks set forth in the Notice of Opposition.

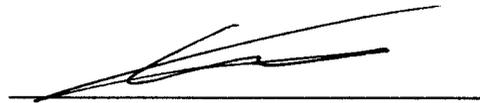
15. Applicant's Mark contains artistic wording and a design mark which can be easily distinguished from those of Opposer.

16. Applicant has begun to use the L.A. Beach and design mark in commerce.

17. Applicant's L.A. Beach and design mark is not so similar to those of Opposer that it is likely to cause confusion, or cause mistake, or to deceive as to the source of the goods.

WHEREFORE, Applicant respectfully prays that the mark sought to be registered be accepted.

Respectfully submitted this 29 day of September, 2014.



CELINE LEGEY-SALISIAN

Applicant

CERTIFICATE OF SERVICE

I hereby certify that on the 22 day of September 2014 at
Alhambra, California, a copy of the foregoing ANSWER
TO NOTICE OF OPPOSITION was served upon the Opposer via U.S. Mail,
postage prepaid, and addresses as follows:

MATHEW H. SAWYERS, Esq.
344 Maple Avenue West, Suite 151
Vienna, Va. 22180



CELINE LEGEY-SALISIAN

Applicant