

ESTTA Tracking number: **ESTTA632218**

Filing date: **10/10/2014**

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

Proceeding	91218304
Party	Defendant Asam, Marcus, Asam, Mirjam, Ruth, Axel
Correspondence Address	DERMOT M. SHERIDAN EPSTEIN DRANGEL LLP 60 E 42ND ST STE 2410 NEW YORK, NY 10165-0011 mail@ipcounselors.com
Submission	Answer
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Signature	/William C. Wright/
Date	10/10/2014
Attachments	DOC101014asam.pdf(49437 bytes)

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

KOSAN KOZMETIK SANAYI VE TICARET
ANONIM SIRKETI,

OPPOSER,

V.

MIRJAM ASAM, MARCUS ASAM, and
AXEL RUTH

APPLICANTS.

Opp. No. 91218304

ANSWER TO NOTICE OF OPPOSITION

Applicants, by their undersigned attorney, hereby answers the allegations set forth in the Notice of Opposition as follows:

1. Applicants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 1 and therefore deny same.
2. Applicants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 2 and therefore deny same.
3. Applicants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 3 and therefore deny same.
4. Applicants lack sufficient knowledge or information to form a belief as to the

truth of the allegations in Paragraph 4 and therefore deny same.

5. Applicants lack sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 5 and therefore deny same.

6. In response to the allegations set forth in misnumbered Paragraph 7, Applicants admit that they filed an application to register the mark FLORA MARE and Design, Ser. No. 86080166, and that said application was published on July 22, 2014, but deny all other allegations.

7. Applicants deny the allegations in misnumbered Paragraph 8.

8. Applicants deny the allegations in misnumbered Paragraph 10.

AFFIRMATIVE DEFENSES

1. The Notice of Opposition fails to state a claim upon which relief can be granted to Opposer.

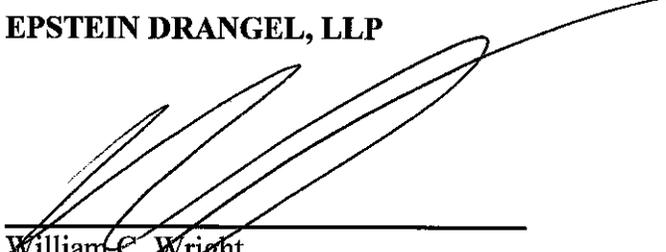
2. Opposer's claims are barred by laches, unclean hands, acquiescence, and/or estoppel.

Respectfully submitted,

EPSTEIN DRANGEL, LLP

Dated: October 10, 2014

By: _____

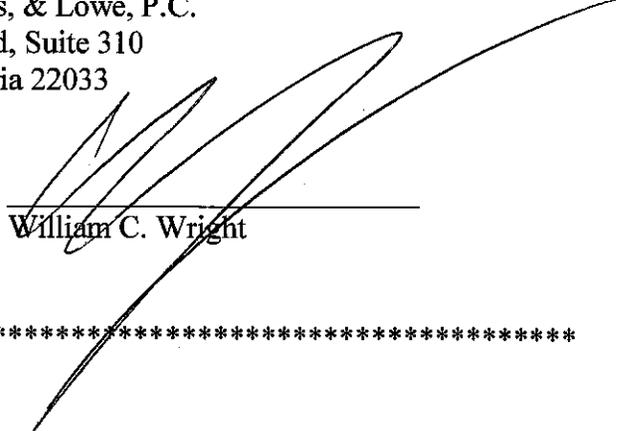

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer to the Notice of Opposition was served by First Class Mail, with sufficient postage prepaid, on this 10th day of October, upon Opposer's counsel:

P. Jay Hines
Muncy, Geissler, Olds, & Lowe, P.C.
4000 Legato Road, Suite 310
Fairfax, Virginia 22033

BY:



William C. Wright
