

ESTTA Tracking number: **ESTTA636667**

Filing date: **11/03/2014**

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

Proceeding	91218586
Party	Defendant Woodes Rogers Holdings Ltd.
Correspondence Address	CARL J. SPAGNUOLO MCHALE & SLAVIN, P.A. 2855 PGA BLVD PALM BEACH GARDENS, FL 33410-2910 ustrademarks@mchaleslavin.com
Submission	Answer
Filer's Name	Carl J. Spagnuolo
Filer's e-mail	ustrademarks@mchaleslavin.com
Signature	/Carl J. Spagnuolo/
Date	11/03/2014
Attachments	91218586 Answer to Notice of Opposition 11032014.pdf(87790 bytes)

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

PATRON SPIRITS INTERNATIONAL AG,

Opposition No.: 91218586

Opposer,

Application Serial No.: 86/054,393

v.

WOODES ROGERS HOLDINGS LTD.,

Applicant.

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Applicant, Woodes Rogers Holdings Ltd., by and through its undersigned attorneys, hereby submits its Answer to the Notice of Opposition filed by Opposer, Patron Spirits International AG, and states:

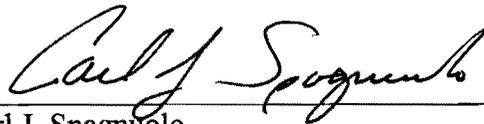
1. Applicant lacks knowledge regarding the statements contained in Paragraph 1, and therefore denies same.
2. Applicant lacks knowledge regarding the statements contained in Paragraph 2, and therefore denies same.
3. Applicant lacks knowledge regarding the statements contained in Paragraph 3, and therefore denies same.
4. Applicant lacks knowledge regarding the statements contained in Paragraph 4, and therefore denies same.
5. Admitted insofar as definition "Opposer's Mark" referring to Reg. Nos 2,058,075 and 2,727,996.

6. Admitted.
7. Applicant lacks knowledge regarding the statements contained in Paragraph 7, and therefore denies same.
8. Applicant never heard of Opposer's "PYRAT" product and thus, lacks knowledge regarding the statements contained in Paragraph 8, and therefore denies same.
9. Denied.
10. Denied.
11. Denied insofar as the registration of Applicant's mark reflected in Application Serial No. 86/054,393 would be a source of damage and injury to Opposer.

WHEREFORE, Applicant requests that the Opposition of Applicant's trademark application, Serial No. 86/054,393, be denied.

Dated: November 3, 2014

Respectfully submitted,

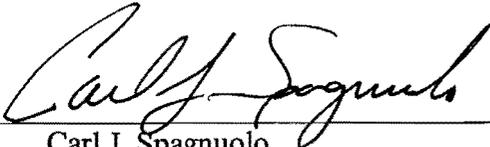


Carl J. Spagnuolo
McHale & Slavin, P.A.
Attorneys for Registrant
2855 PGA Boulevard
Palm Beach Gardens, Florida 33410
(561) 625-6575 F: (561) 625-6572
cspagnuolo@mchaleslavin.com

CERTIFICATE OF FILING AND SERVICE

I HEREBY CERTIFY that the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION was filed electronically with the Trademark Trial and Appeal Board using the ESTTA filing system, on November 3, 2014. Notice of this filing will be sent to counsel for all parties by email and U.S. Mail to the following Address:

Bernard R. Gans
Jeffer Mangels Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067-5010
trademarkdocket@jmbm.com



Carl J. Spagnuolo

BRG@JMBM.com