

ESTTA Tracking number: **ESTTA674217**

Filing date: **05/26/2015**

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

Proceeding	91219513
Party	Defendant Dr. Shirley Ross
Correspondence Address	ANTHONY M VERNA III KRAVITZ & VERNA PLLC P O BOX 3620293, PACC NEW YORK, NY 10129 UNITED STATES averna@kravitzverna.com
Submission	Answer
Filer's Name	Anthony M. Verna III
Filer's e-mail	averna@kravitzverna.com
Signature	/s Anthony M. Verna III s/
Date	05/26/2015
Attachments	answer - Shirley Ross - BOOKS.pdf(352561 bytes)

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

BFF Biz, LLC)	Opposition No.: 91219513
)	
Plaintiff/Registrant,)	
)	
vs.)	
)	
Shirley Ross)	
)	
Defendant/Applicant)	
)	
)	
)	
)	
)	
)	
)	
)	

ANSWER

Shirley Ross, the Applicant/Defendant, by and through her attorney, hereby answers the Notice of BFF Biz, LLC (“Opposer” or “Registrant”) filed to begin the above-captioned proceeding.

1. Applicant does not have enough information either to admit or deny all statements in this paragraph.
2. Applicant admits the statements in this paragraph.
3. Applicant does not have enough information either to admit or deny all statements in this paragraph.
4. Applicant does not have enough information either to admit or deny all statements in this paragraph.
5. Applicant does not have enough information either to admit or deny all statements in this paragraph.
6. Applicant does not have enough information either to admit or deny all statements in this paragraph.
7. Applicant does not have enough information either to admit or deny all statements in this paragraph.
8. Applicant does not have enough information either to admit or deny all statements in this paragraph.
9. Applicant admits the statements in this paragraph.

10. Applicant does not have enough information either to admit or deny all statements in this paragraph.
11. Applicant does not have enough information either to admit or deny all statements in this paragraph.
12. Applicant admits the statements in this paragraph.
13. Applicant admits the statements in this paragraph.
14. Applicant does not have enough information either to admit or deny all statements in this paragraph.
15. Applicant denies the statements in this paragraph.
16. Applicant denies the statements in this paragraph.
17. Applicant does not have enough information either to admit or deny all statements in this paragraph.
18. Applicant denies the statements in this paragraph.
19. Applicant denies the statements in this paragraph.
20. Applicant denies the statements in this paragraph.
21. Applicant denies the statements in this paragraph.
22. Applicant denies the statements in this paragraph.
23. Applicant denies the statements in this paragraph.

THE PARTIES' MARKS ARE DIFFERENT

1. Registrant's marks contain the disclaimed portion, "Books."
2. Applicant's mark has a radically different dominant portion than Registrant's marks because of the disclaimer.
3. Applicant's mark and Registrant's marks are spelled differently and pronounced differently.
4. Applicant's goods/services are different than Registrant's goods/services.
5. Therefore, the marks are different, the goods and services are different, and no likelihood of confusion in consumers will be caused.

Dated: May 26, 2015

/s Anthony M. Verna III
Anthony M. Verna III, Esq.
Kravitz & Verna PLLC
160 West End Avenue
New York, NY 10023
Attorney for Applicant
Shirley Ross

