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

Proceeding	91220731
Party	Defendant GLA Head Office
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Date	04/02/2015
Attachments	Answer.pdf(10519 bytes)

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

RENAISSANCE HOTEL HOLDINGS, INC.,

Opposer,

v.

GLA HEAD OFFICE,

Applicant.

Opposition No.: 91220731

Mark: GLA RENAISSANCE ART THEATER

Serial No.: 79/148,136

ANSWER

Applicant GLA Head Office ("Applicant"), by and through counsel, hereby states the following for its Answer to the Notice of Opposition filed by Renaissance Hotel Holdings, Inc. ("Opposer"):

1. As to paragraph 1 of the Notice of Opposition, Applicant denies that the mark RENAISSANCE is famous and is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations of that paragraph.

2. As to paragraph 2 of the Notice of Opposition, Applicant denies that Opposer has a family of RENAISSANCE marks and is otherwise without knowledge or information sufficient to form a belief as to the truth of the allegations of that paragraph.

3. As to paragraph 3 of the Notice of Opposition, Applicant admits that Opposer owns registrations for some of the recited marks, but is otherwise without knowledge of information sufficient to form a belief as to the truth of the allegations of that paragraph.

4. As to paragraph 4 of the Notice of Opposition, Applicant admits that to the extent Opposer owns the registrations recited in paragraph 3, Opposer is entitled to the presumptions

provided for by law, but denies that such presumptions are controlling as to factual issues.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 5 to 7 of the Notice of Opposition, except that Applicant denies that Opposer's marks have become famous.

6. Applicant admits the allegations of paragraph 8 of the Notice of Opposition, except as to Opposer's prior rights in the RENAISSANCE marks and as to the allegation that the recited services were those that were originally contained in the application.

7. In response to paragraph 9 of the Notice of Opposition, Applicant admits that it knew that Opposer asserted trademark rights in the term RENAISSANCE in some contexts, but denies that Applicant was aware of any rights of Opposer pertinent to Applicant's mark or its intended scope of use.

8. Applicant denies the allegations of paragraph 10 of the Notice of Opposition.

COUNT I

9. In response to paragraph 11 of the Notice of Opposition, Applicant incorporates its responses to paragraph 1 to 10 of the Notice of Opposition.

10. Applicant denies the allegations of paragraphs 12 to 17 of the Notice of Opposition.

COUNT II

11. In response to paragraph 18 of the Notice of Opposition, Applicant incorporates its responses to paragraph 1 to 17 of the Notice of Opposition.

12. Applicant denies the allegations of paragraphs 19 to 23 of the Notice of Opposition.

13. Except as specifically admitted above, Applicant denies all the allegations of the Notice of Opposition.

For the foregoing reasons, Applicant respectfully requests that the Notice of Opposition

be dismissed with prejudice, and that the Board allow registration of Applicant's mark.

Date: April 2, 2015

/William J. Utermohlen/

William J. Utermohlen

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Attorneys for Applicant GLA Head Office

CERTIFICATE OF SERVICE

This is to certify that on this 2nd day of April, 2015, a copy of the foregoing

ANSWER was served by first class mail, postage prepaid, on:

Paul F. Kilmer
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/William J. Utermohlen/
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