

ESTTA Tracking number: **ESTTA664884**

Filing date: **04/03/2015**

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

Proceeding	91220748
Party	Defendant RLP Ventures, LLC
Correspondence Address	RLP VENTURES, LLC RLP VENTURES, LLC PO BOX 2605 NEW YORK, NY 10108-2605 rlpvllc@gmail.com
Submission	Answer
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Signature	/Ramona Prioleau/
Date	04/03/2015
Attachments	Answer to the Notice of Opposition FRAMIATI 86309802.pdf(600266 bytes)

I HEREBY CERTIFY THAT THIS CORRESPONDENCE IS BEING TRANSMITTED ELECTRONICALLY TO THE COMMISSIONER FOR TRADEMARKS - <http://estta.uspto.gov/filing-type.jsp>

BY:

Ramona Prudean

DATE:

4/3/2015

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

-----X
FRAMKAT, LP and FRAMESI SpA

Opposers,

v.

Opposition No. 91220748

RLP VENTURES, LLC

Applicant.
-----X

ANSWER TO NOTICE OF OPPOSITION

Honorable Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

In the matter of trademark Application Serial No. 86309802 filed on June 14, 2014 for the mark, FRAMIATI, published in the *Trademark Official Gazette* on November 11, 2014.

Applicant, RLP Ventures, LLC (“Applicant” or “RLP”), having an address at Times Square Station, P.O. Box 2605, New York, New York 10108-2605, hereby replies to the numbered grounds for opposition set forth in Opposers’ Notice of Opposition as follows::

1. Answering paragraph 1 of the Notice of Opposition, Applicant admits the allegations thereof.

2. Answering paragraph 2 of the Notice of Opposition, Applicant admits the allegations thereof.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 and therefore denies those allegations.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 and therefore denies those allegations.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 and therefore denies those allegations.

6. Applicant makes no answer to the allegations in paragraph 6 to the extent those allegations state legal conclusions rather than facts. Furthermore, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6 and therefore denies those allegations.

7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7 and therefore denies those allegations.

8. Applicant makes no answer to the allegations in paragraph 8 to the extent those allegations state legal conclusions rather than facts. Furthermore, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 and therefore denies those allegations.

9. Applicant makes no answer to the allegations in paragraph 9 to the extent those allegations state legal conclusions rather than facts. Furthermore, Applicant lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in paragraph 9 and therefore denies those allegations.

10. Applicant makes no answer to the allegations in paragraph 10 to the extent those allegations state legal conclusions rather than facts. Furthermore, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 10 and therefore denies those allegations.

11. Applicant makes no answer to the allegations in paragraph 11 to the extent those allegations state legal conclusions rather than facts. Furthermore, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11 and therefore denies those allegations.

12. Answering paragraph 12 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

13. Answering paragraph 13 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

14. Answering paragraph 14 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

15. Answering paragraph 15 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

16. Applicant denies that Opposers will be damaged by the registration of U.S. Serial No. 86309802 for the mark FRAMIATI or that Opposers are entitled to any relief requested in the Notice of Opposition.

17. Applicant further affirmatively alleges that as a result of its continuous substantial usage of its mark FRAMIATI since adoption, this mark is a valuable asset of Applicant and carries considerable goodwill and consumer acceptance of its products sold under the mark. Such goodwill and widespread usage has made the mark distinctive to the Applicant.

18. Applicant further affirmatively alleges that there is no likelihood of confusion, mistake or deception because, inter alia, Applicant's mark and the pleaded marks of Opposers are not confusingly similar.

19. Applicant hereby gives notice that it may rely on any other defenses that may become available or appear proper during discovery, and hereby reserves its right to amend this Answer to assert such defenses.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Dated: April 3, 2015

Respectfully submitted,

By: Ramona Prioleau

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APPLICANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Answer to the Notice of Opposition was served on the Attorney for the Opposers on the date listed below via U.S. Mail and email:

Roberta Jacobs-Meadway
Eckert Seamans Cherin & Mellott, LLC
50 South 16th Street, 22nd Floor
Philadelphia, P A 19102
rjacobsmeadway@eckertseamans.com

Dated: April 3, 2015

By: 
Ramona Prioleau