

ESTTA Tracking number: **ESTTA703025**

Filing date: **10/19/2015**

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

Proceeding	91223747
Party	Defendant Barry's Bootcamp Holdings, LLC
Correspondence Address	RUTH RIVARD STINSON LEONARD STREET 150 S 5TH ST STE 2300 MINNEAPOLIS, MN 55402-4223 trademark.MPL@stinsonleonard.com;ruth.r
Submission	Answer
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Date	10/19/2015
Attachments	Barry's Bootcamp Answer to Converse Opposition.pdf(15553 bytes)

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

Converse Inc.,

Opposition No.: 91223747

Opposer,

v.

Barry's Bootcamp Holdings, LLC,

Applicant.

ANSWER TO OPPOSER'S NOTICE OF OPPOSITION

Through the undersigned counsel, Applicant, Barry's Bootcamp Holdings, LLC ("BBH"), answers the Notice of Opposition filed against Application Serial No. 86/384,309 by Opposer, Converse Inc. ("Opposer"), as set forth below. The Answer paragraphs are numbered to correspond to the numbered paragraphs of the Notice of Opposition.

The first paragraph of the Notice of Opposition is an introductory paragraph to which no responsive pleading is required. To the extent a response is deemed necessary, BBH denies that Opposer will be damaged by registration of the mark that is the subject of Application Serial No. 86/384,309 (the "Subject Application").

1. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 1 of the Notice of Opposition and, therefore, denies the same.

2. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 2 of the Notice of Opposition and, therefore, denies the same.

3. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in in Paragraph 3 of the Notice of Opposition and, therefore, denies the same.

4. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 4 of the Notice of Opposition and, therefore, denies the same.

5. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 5 of the Notice of Opposition and, therefore, denies the same.

6. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 6 of the Notice of Opposition and, therefore, denies the same.

7. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 7 of the Notice of Opposition and, therefore, denies the same.

8. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 8 of the Notice of Opposition and, therefore, denies the same.

9. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 9 of the Notice of Opposition and, therefore, denies the same.

10. BBH admits the allegations contained in Paragraph 10 of the Notice of Opposition.

11. BBH admits the allegations contained in Paragraph 11 of the Notice of Opposition with respect to the goods in International Classes 28 and 41. Applicant deleted the goods in International Class 25 from the Subject Application through a post publication amendment which was filed on September 8, 2015.

12. BBH admits the allegations contained in Paragraph 12 of the Notice of Opposition with respect to International Classes 28 and 41. The goods in International Class 25 have been deleted from the Subject Application and therefore any of Opposer's allegations directed to goods in International Class 25 are irrelevant.

13. BBH is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 13 of the Notice of Opposition and, therefore, denies the same.

14. BBH admits the allegations contained in Paragraph 14 of the Notice of Opposition.

15. BBH denies the allegations contained in Paragraph 15.

16. BBH denies the allegations contained in Paragraph 16.

17. The goods in International Class 25 have been deleted from the Subject Application and therefore any of Opposer's allegations directed to goods in International Class 25 are irrelevant. To the extent a response is deemed necessary, BBH denies the allegations contained in Paragraph 17.

18. BBH denies the allegations contained in Paragraph 18.

AFFIRMATIVE DEFENSES AND ALLEGATIONS

BBH reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Lanham Act, and any other defenses or counterclaims at law or in equity, that

may now exist or in the future be available based on discovery and further factual investigation in this case.

WHEREFORE, Applicant, BBH, respectfully requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition with prejudice.

STINSON LEONARD STREET LLP

Dated: October 19, 2015

By: *Ruth Rivard*

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ATTORNEYS FOR

Barry's Bootcamp Holdings, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing ANSWER TO OPPOSER'S NOTICE OF OPPOSITION was served on October 19, 2015, upon the following attorney for Converse Inc. by First Class Mail:

B. Anna McCoy
Alleman Hall McCoy Russell & Tuttle LLP
806 SE Broadway, Suite 600
Portland, OR 97205

Dated: October 19, 2015 /Ruth Rivard/