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Filing date: **12/21/2015**

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

Proceeding	91225166
Party	Defendant TREASURY WINE ESTATES AMERICAS COMPANY
Correspondence Address	GARY D KRUGMAN SUGHRUE MION, PLLC 2100 PENNSYLVANIA AVE NW WASHINGTON, DC 20037-3202 UNITED STATES tm@sughrue.com
Submission	Answer
Filer's Name	Gary D. Krugman
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Signature	/Gary D. Krugman/
Date	12/21/2015
Attachments	H00253 Answer to Amended Notice of Opposition (December 21, 2015) As Filed.pdf(31825 bytes)

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

WARNER BROS. ENTERTAINMENT, INC.,

Opposer,

vs.

TREASURY WINE ESTATES AMERICAS
COMPANY

Applicant.

Opposition No. 91225166

Serial No. 8602212

Mark: TAZ

APPLICANT'S ANSWER TO AMENDED NOTICE OF OPPOSITION

Applicant, by its attorneys, in response to the Amended Notice of Opposition, hereby answers as follows:

1. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 1 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

2. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 2 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

3. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 3 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

4. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 4 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

5. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 5 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

6. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 6 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

7. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 7 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

8. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 8 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

9. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 9 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

10. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 10 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

11. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 11 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

12. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 12 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

13. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 13 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

14. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 14 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

15. Applicant admits that its application for registration was filed on February 24, 2014 for the mark TAZ for goods identified as wine. Applicant otherwise has insufficient knowledge or information upon which to form a belief as to the truth of the remainder of the allegations set forth in numbered paragraph 15 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

16. Applicant admits that its alleged dates of first use set forth in the application are "at least as early as 2004." Applicant reserves the right to demonstrate an earlier date of first use, if evidence of such earlier use can be located.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Admitted.

24. Denied.

25. Admitted.

26. Denied.

27. Denied.

28. Denied.

29. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 29 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

30. Denied.

31. Admitted.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 37 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

38. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in numbered paragraph 38 of the Amended Notice of Opposition and, therefore, Applicant denies said allegations.

39. Denied.

40. Denied.

41. Denied.

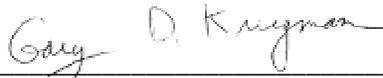
- 42. Denied.
- 43. Denied.
- 44. Denied.
- 45. Denied.

WHEREFORE, Applicant respectfully requests the Opposition be dismissed with prejudice and that Applicant's mark proceed to registration.

Respectfully submitted,

TREASURY WINE ESTATES
AMERICAS COMPANY

By:



Gary D. Krugman
Attorney for Applicant
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Date: December 21, 2015

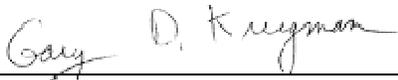
CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing ANSWER TO AMENDED NOTICE OF OPPOSITION has been served via first class mail, postage prepaid, this 21st day of December 2015 to:

Warner Bros. Entertainment, Inc.
Attn: Avis Frazier-Thomas
4000 Warner Blvd.
Burbank, CA 91522

and

Michael A. Grow
Arent Fox LLP
1050 Connecticut Ave., NW
Washington, DC 20006
Attorney for Opposer



Gary D. Krugman