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

Proceeding	91226307
Party	Defendant Heir LLC
Correspondence Address	CLAY A TILLACK SCHIFF HARDIN LLP 233 S WACKER DR STE 6600 CHICAGO, IL 60606 UNITED STATES trademarks@schiffhardin.com, ctillack@schiffhardin.com
Submission	Answer
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Date	04/26/2016
Attachments	Answer to Opposition Corrected Certificate of Service.pdf(45912 bytes)

3. Opposer, since at least March 12, 2015, has been, and is now, selling clothing, accessories, beer, lager, ale, distilled spirits, alcoholic beverages, wine, champagne, and sparkling wine, and has operated an retail and on-line store services under the name TROPHY ROOM. Said use has been valid and continuous since said date of first use and the relevant class of the public has come to associate Opposer with said designation. In view of the similarity of Applicant's marks with Opposer's designation, and in view of the related nature of the uses thereof, it is alleged that Applicant's mark consists of and comprises matter that may disparage and falsely suggest a connect with Opposer.

ANSWER: Applicant denies the allegations in Paragraph 3.

4. Opposer therefore requests that registration of the opposed mark be denied.

ANSWER: Paragraph 4 is a prayer for relief for which no answer is required.

5. Additionally, Opposer requests such other and further relief as is deemed just and proper.

ANSWER: Paragraph 5 is a prayer for relief for which no answer is required.

WHEREFORE, Applicant requests that the Opposition be dismissed with prejudice and that the application be granted.

Respectfully submitted,

HEIR LLC

By: _____


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CERTIFICATE OF SERVICE (CORRECTED)

I hereby certify that a true and complete copy of the foregoing Answer to the Notice of Opposition has been served on Opposer's counsel of record on this 26th day of April, 2016, by depositing a copy of the same in the United States mail, postage prepaid and properly addressed as follows:

Christie Gaumer
Law Offices of Christie Gaumer
3940 LAUREL CANYON BLVD NO 733
STUDIO CITY, CA 91604



Clay A. Tiffack