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

Proceeding	91226828
Party	Defendant Jules Taylor Holdings Limited
Correspondence Address	CHARLES F. REIDELBACH, JR. Higgs Fletcher & Mack Llp 401 W A St Ste 2600 San Diego, CA 92101-7913 trademarks@higgslaw.com
Submission	Answer
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Date	07/19/2016
Attachments	JULES Opposition - Answer.pdf(126749 bytes)

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

Domaine du Grand Cros,
Opposer,

v.

Jules Taylor Holdings Limited,
Applicant.

Opposition No.: 91226828
Regarding Application No. 86670573
Mark: JULES

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Jules Taylor Holdings Limited (“Applicant”) for its answer to the Notice of Opposition filed by Domaine du Grand Cros (“Opposer”) against application for registration of Applicant's trademark **JULES**, Serial No. 86670573 filed June 22, 2015 at the United States Patent and Trademark Office (“USPTO”) and published in the Official Gazette on November 17, 2015, pleads and avers as follows:

Answering the unnumbered preamble paragraph, Applicant is without information or belief to admit or deny the allegations concerning Opposer’s belief with respect to the mark **JULES**, Serial No. 86670573 and on that basis, denies those allegations.

Answering the numbered paragraphs:

1. Applicant is without information or belief sufficient to admit or deny the allegations contained in Paragraph 1, and therefore denies same.
2. Applicant is without information or belief sufficient to admit or deny the allegations in Paragraph 2, and therefore denies same.
3. Applicant is without information or belief sufficient to admit or deny the allegations in Paragraph 3, and therefore denies same.

4. Applicant admits the allegations in Paragraph 4 of the Notice of Opposition.
5. Applicant denies the allegations in Paragraph 5 of the Notice of Opposition.
6. Applicant denies the allegations in Paragraph 6 of the Notice of Opposition.
7. Applicant denies the allegations in Paragraph 7 of the Notice of Opposition.

AFFIRMATIVE DEFENSES

1. Opposer's Notice of Opposition fails to state a claim upon which relief can be granted, and in particular, fails to state legally sufficient grounds for sustaining the opposition.
2. Opposer's claims are barred in whole or in part by laches, acquiescence, estoppel, and waiver from sustaining this opposition.
3. Opposer's claims are barred because Opposer abandoned some or all of the alleged trademark rights upon which it relies in the Notice of Opposition.
4. Opposer's claims are barred because Opposer does not own trademark rights for some or all of the purported marks.
5. Opposer's alleged use of the "JULES" mark does not constitute trademark use.
6. Applicant reserves the right to assert all defenses disclosed or developed in the course of discovery or trial.

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RELIEF REQUESTED

WHEREFORE, Applicant respectfully requests

1. This opposition proceeding be dismissed, with prejudice.
2. Any other relief the Board deems proper.

Dated: July 19, 2016

Respectfully submitted,



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ATTORNEYS FOR APPLICANT

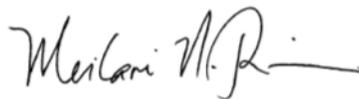
CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION was served on July 19, 2016 to Martin J. Beran, attorney of record for Opposer Domaine du Grand Cros via first class mail to:

Martin J. Beran
Ostrolenk Faber LLP
1180 Avenue of the Americas FL 7
New York, NY 10036

Dated: July 19, 2016

By:

A handwritten signature in black ink, appearing to read "Meilani N. Rivera", with a horizontal line extending to the right from the end of the signature.

Meilani N. Rivera, Paralegal