

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

Salt Life, LLC v. Robert Gruenenfelder

Opposition No. 91228109

Serial No. 86830904

“Answer”

I, Robert Gruenenfelder, applicant of the mark “Live a Servant Life” in the above proceeding, formally “DENY” the allegations presented by the opposer, Salt Life, LLC.

As to the allegation listed as **item 14** on page 6, that my mark is “confusingly similar in sound, appearance, connotation, and overall impression”, I DENY it. The sound of the phrase “LIVE A SERVANT LIFE” does not “sound” like ‘LIVE A SALT LIFE’. The words “servant” and “salt” are not similar in pronunciation. The “**appearance**” of the marks are drastically different in the first part of the mark. I concede that the word “life” is similar but my mark has a Christian fish symbol as the letter “e”, uniquely different than the “e” in the SALT LIFE mark. The “**connotations**” of the two marks are drastically different. My mark is aimed at promoting a life of Christian servitude to our fellow man, while I believe the connotation of the SALT LIFE mark is to promote a leisure lifestyle of salt water activities. And lastly in item 14., I deny that my mark would infringe upon the “**impression**” of the SALT LIFE mark. There are too many dissimilarities as described above.

As to the allegation in **item 15**, that “goods” I plan to sell in my application are similar to that which SALT LIFE sells, I concede that I plan to sell T-shirts and sweat shirts with my unique mark.



06-28-2016

As to the allegation in **item 16**, that my mark would be “likely to cause confusion, mistake, or to deceive consumers, etc. that they were purchasing from SALT LIFE,LLC, I DENY IT. As described above there are too many distinctions between these two marks, unlike the several yellow pages “let your fingers do the walking” logos which are so similar that there is confusion.

As to the allegation in **item 17**, that my mark would “cause dilution of the distinct qualities of SALT LIFE, I DENY it. I have seen numerous commercial goods bearing a slogan or company name promoting some sort of “life”. A few examples I have witnessed are “LIFE IS GOOD”, “NATURAL LIFE”, “MUD LIFE”, “RED NECK LIFE”, “LAKE LIFE”, “MOUNTAIN LIFE”, “ISLAND LIFE”, and I’m sure there are several others. My intent is to promote living a servant life as called for in the Christian faith.

WHEREFORE, Applicant does not believe the SALT LIFE,LLC would be damaged by granting the trademark and prays that the opposition be denied.

Respectfully submitted,

date June 24, 2016



Robert Gruenenfelder

creator of “live a servant life” logo

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I hereby certify that a true and complete copy of the foregoing "Answer" has been served on
Dority and Manning, attorneys for the opposer by mailing a said copy on June 24, 2016 via

First Class Mail.



Robert Gruenfelder

June 24, 2016