

ESTTA Tracking number: **ESTTA583360**

Filing date: **01/22/2014**

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

Proceeding	92058369
Party	Defendant S&O Innovations, LLC
Correspondence Address	S&O INNOVATIONS LLC 7735 NW 53 ST, MIAMI, FL 33166 UNITED STATES
Submission	Answer
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Date	01/22/2014
Attachments	Answer-Puppy.pdf(19448 bytes)

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

Under Armour, INC,

Plaintiff,

vs.

S&O Innovations, LLC,

Defendant

Opposition No. 91212545

Serial No. 85718384

ANSWER

S&O Innovations, LLC, the Registrant of Reg. No. 4315559 hereby responds solely for the purposes of this proceeding, to each of the grounds set forth in the Petition for Cancellation, as follows:

Paragraphs 1 through 19: Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph.

Paragraphs 20 through 24: Admitted

Paragraph 26: Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph.

Paragraph 27: Denied

Paragraphs 29 through 31: Denied

AFFIRMATIVE DEFENSES

1. The Petitioner fails to state a claim upon which relief can be granted.

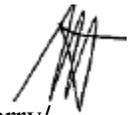
2. The Petitioner has failed to state its, false suggestion of a connection and likelihood of confusion claims with the requisite particularity.

3. Applicant hereby reserves all right to assert additional defenses, should Applicant learn of grounds for such defenses during the course of this Cancellation proceeding.

PRAYER FOR RELIEF

S&O Innovations, LLC, prays that the Petition for Cancellation be dismissed in its entirety with prejudice and that the Trademark Trial and Appeal Board grant such other relief as it deems just and proper.

Respectfully submitted,


/Mark Terry/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Jan. 22, 2014 I served this document via U.S. mail to counsel of record for Petitioner, Aaron Silverstein, Saunder and Silverstein, 14 Cedar St. #224, Amesbury, MA01913.


/Mark Terry/

Mark Terry, Esq.