

TTAB

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

In the Matter of Application Serial No. 76/044,388

-----X  
TITAN INDUSTRIES LIMITED :  
 :  
 Opposer, :  
 :  
 -against- :  
 :  
 MOVADO LLC, :  
 :  
 Applicant. :  
-----X

Opposition No. 122,935



07-02-2001

U.S. Patent & TMO/TM Mail Rpt Dt. #11

BOX TTAB  
No Fee  
Assistant Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, Virginia 22202-3513

ANSWER

5 2001  
13  
Applicant Movado LLC, formerly known as Corporation ("Applicant"), by its attorneys  
FRÖSS ZELNICK LEHRMAN & ZISSU, P.C., answer the Notice of Opposition as follows:

- (a) Applicant denies having knowledge or information sufficient to admit or deny the allegations in paragraph (a).
- (b) Applicant denies the allegations in paragraph (b).
- (c) Applicant denies the allegations in paragraph (c).
- (d) Applicant denies the allegations in paragraph (d).

Applicant denies the allegation that Opposer will be damaged if Applicant is permitted to have said application issue to registration.

FIRST AFFIRMATIVE DEFENSE


The Opposition fails to state a claim upon which relief may be granted.


WHEREFORE, Applicant requests that the Opposition be denied in its entirety and that Applicant's application be passed on to registration.

Dated: New York, New York  
July 2, 2001

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

"Express Mail" mailing label No. EL846858145US  
Date of Deposit July 2, 2001 I hereby certify that this paper or fee is being deposited with the United States Postal Service as "Express Mail Post Office to Addressee" service under 37 CFR 1.10 on the date indicated above and is addressed to the Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513.

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Printed name of person mailing paper or fee)  
  
Signature

**CERTIFICATE OF SERVICE**

The undersigned, counsel for Applicant Movado LLC, hereby certifies that a true and correct copy of the attached Answer was served by pre-paid first-class U.S. Mail on July 2, 2001 on counsel for Opposer, Stephen A. Goldsmith and Teresa L. Segalman, Ladas & Perry, 26 West 61<sup>st</sup> Street, New York, New York 10023.

  
Tamar Niv