

ESTTA Tracking number: **ESTTA106172**

Filing date: **10/25/2006**

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

| | |
|------------------------|---|
| Proceeding | 91165129 |
| Party | Defendant National CASA Association National CASA Association North Tower Suite 500 100 West Harrison Seattle, WA 98119 |
| Correspondence Address | Heidi L. Sachs Perkins Coie LLP Suite 4800 1201 Third Avenue Seattle, WA 98101-3099 pctrademarks@perkinscoie.com |
| Submission | Answer |
| Filer's Name | James L. Vana |
| Filer's e-mail | pctrademarks@perkinscoie.com |
| Signature | /James L. Vana/ |
| Date | 10/25/2006 |
| Attachments | ANSWER.pdf (3 pages)(137873 bytes) |

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

INTERNATIONAL SAVE THE CHILDREN
ALLIANCE

Opposer,

v.

NATIONAL CASA ASSOCIATION

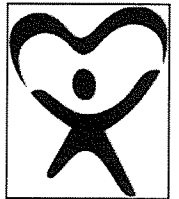
Applicant.

Opposition No.: 91165129

ANSWER TO NOTICE OF OPPOSITION

Applications No. 78/355,917 & 78/355,929

Applicant National Casa Association ("Applicant"), owner of the above-referenced application (the "Application") for the mark pictured at right (the "Mark"), by and through its undersigned counsel, hereby submits this answer to the Notice of Opposition (the "Notice") as follows:



1. Admitted.
2. Admitted.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3, and on that basis denies them.

4. Applicant admits that the on-line records of the Federal Trademark Office list Opposer as the registrant of record of the claimed registrations No. 1,080,066, 2,617,998 and 1,377,142 ("Opposer's Registrations"). Applicant lacks knowledge or information sufficient to form a belief as to the truth of Opposer's claim (if any) that Opposer is the legal owner of the noted mark or registrations and on that basis denies any such claim. Applicant denies that registration No. 1,377,142 is valid and subsisting, as the on-line records of the federal Trademark Office show that registration as cancelled.

5. Applicant admits that Applicant's Filing Date is later than the application dates for Opposer's Registrations. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5, and on that basis denies them.

6. Applicant admits that Applicant's Mark depicts a stick figure with upstretched arms and the arms form the bottom half of an outline of a heart. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 6, and on that basis denies the same.

7. Applicant lacks knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 7 and on that basis denies them.

8. Applicant lacks knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 8 and on that basis denies them.

9. Applicant lacks knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 9 and on that basis denies them.

10. Applicant acknowledges certain similarities between Applicant's Mark and Opposer's Mark. Applicant denies that the parties' marks are (or could be) phonetically similar. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 10, and on that basis denies them.

11. Denied.

12. Denied.

13. Denied.

14. Denied.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed in its entirety and that the Trademark Office issue Notice of Allowances for the Applications.

DATED: October 25, 2006

PERKINS COIE LLP

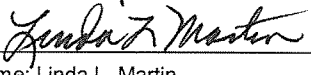
By 

James L. Vana
Perkins Coie LLP
1201 Third Avenue, 40th Floor
Seattle, Washington 98101-3099
(206) 359-8000

Attorneys for
National Casa Association

CERTIFICATE OF SERVICE

I hereby certify that this ANSWER is being deposited with the United States Postal Service with sufficient postage as first class mail on October 25, 2006 in an envelope addressed to S. Roxanne Edwards, Esq., Baker & McKenzie, 2001 Ross Avenue, 2300 Trammell Crow Center, Dallas, TX 75201

Signature 

Printed Name: Linda L. Martin