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Filing date: **02/08/2006**

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

| | |
|------------------------|---|
| Proceeding | 91168396 |
| Party | Defendant GB Promotions, LLC GB Promotions, LLC 947 East Park Center Blvd., Suite 345 Boise, ID 83706 |
| Correspondence Address | DOUGLAS B CANNON FABIAN & CLENDENIN 215 S STATE ST FL 12 SALT LAKE CITY, UT 84111-2319 |
| Submission | Answer |
| Filer's Name | Douglas B. Cannon |
| Filer's e-mail | dcannon@fabianlaw.com |
| Signature | /douglas b. cannon/ |
| Date | 02/08/2006 |
| Attachments | GB Promotions Avon Answer.pdf (4 pages) |

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

**In the Matter of Application
Serial No. 78/496,853 Published
in the Official Gazette of September 6, 2005**

| | | |
|-----------------------------|----------|--------------------------------|
| | X | |
| AVON PRODUCTS, INC., | : | |
| Opposer, | : | Opposition No. 91168396 |
| v. | : | |
| GB PROMOTIONS, LLC, | : | |
| Applicant. | : | |
| | X | |

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

GB PROMOTIONS LLC, an Idaho limited liability company with its place of business at 947 East Park Center Blvd., Suite 345, Boise, Idaho (hereinafter “Applicant”), responds to the Notice of Opposition filed by Avon Products Inc.

FIRST DEFENSE

Applicant responds to the Opposer’s allegations as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Notice of Opposition and thereby denies them.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Notice of Opposition and thereby denies them.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the Notice of Opposition and thereby denies them.

4. Applicant admits that Opposer is the owner of Registrations Nos. 633,318; 663,255; 692,928; 1,122,624; 1,538,820; and 1,555,418 as set out in paragraph 4 of the Notice of Opposition and states that such registrations speak for themselves.

5. Applicant admits that Opposer is the owner of Registration Nos. 1,492,828; 2,253,734; 2,290,282; 2,492,961; 2,745,199; and 2,988,035 as set out in paragraph 5 of the Notice of Opposition and states that such registrations speak for themselves.

6. Applicant admits the allegations in paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegations in paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations in paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations in paragraph 9 of the Notice of Opposition.

SECOND DEFENSE

Applicant alleges as an affirmative defense that there is no likelihood of confusion between Opposer's marks with respect to the mark and goods as set forth in the application.

DATED this 9th day of February, 2006.



Douglas B. Cannon
FAB IAN & CLENDENIN,
A Professional Corporation
Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2006, I caused to be mailed, by first class United States mail, a true and correct copy of the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION to the following:

William R. Golden, Jr.
Michelle M. Graham
KELLEY DRYE & WARREN LLP
Attorneys for Opposer
101 Park Avenue
New York, NY 10178


