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

Proceeding	91169240
Party	Defendant Yuhao, CHEN Yuhao, CHEN 1 Xiongqi Road, Songgangshashui Industrial Park, Nanhai District CNX Foshan City,
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Submission	Answer
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 78/523,204
Trademark: MARRIOLA
Applicant's Ref: YUHA USA TC-06/03221

MARRIOTT INTERNATIONAL, INC.,	X	
Opposer,	:	
v.	:	
YUHAO CHEN,	:	Opposition No. 91169240
Applicant.	:	
	X	

ANSWER

Applicant, for his Answer to the Notice of Opposition herein, states:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1.

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 2.

3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3.

4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 4.

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 5.

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 6.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 7.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 9.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 10.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 12.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 13.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 14.

15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 15.

16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16.

17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 18.

19. Admits the allegations set forth in paragraph 19 beginning with the words “on November 26, 2004 . . .,” but denies that any rights Opposer may have in the MARRIOTT mark or Opposer’s Stylized Mark are relevant to the filing described in the portion of paragraph 19 beginning with those words, and denies knowledge or information sufficient to form a belief as to the truth of the allegation that any rights Opposer may have in the MARRIOTT mark or Opposer’s Stylized Mark date from prior to November 26, 2004.

20. Denies the allegations set forth in paragraph 20.

21. Denies the allegations set forth in paragraph 21.

22. Denies the allegations set forth in paragraph 22.

23. Denies the allegations set forth in paragraph 23.

24. Denies the allegations set forth in paragraph 24.

25. Admits the allegations set forth in paragraph 25.

26. Admits the allegations set forth in paragraph 26.
27. Denies the allegations set forth in paragraph 27.
28. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 28.
29. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 29.
30. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 30.
31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 31.
32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 32.
33. Applicant repeats and incorporates by reference his responses to the allegations contained in paragraphs 1 through 32, above, as if set forth in their entirety herein.
34. Denies the allegations set forth in paragraph 34.
35. Denies the allegations set forth in paragraph 35.
36. Denies the allegations set forth in paragraph 36.
37. Denies the allegations set forth in paragraph 37.
38. Denies the allegations set forth in paragraph 38.

39. Denies the allegations set forth in paragraph 39.

40. Denies the allegations set forth in paragraph 40.

41. Applicant repeats and incorporates by reference his responses to the allegations contained in paragraphs 1 through 40, above, as if set forth in their entirety herein.

42. Denies the allegations set forth in paragraph 42.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 43.

44. Denies the allegations set forth in paragraph 44.

45. Denies the allegations set forth in paragraph 45.

46. Denies the allegations set forth in paragraph 46.

47. Denies the allegations set forth in paragraph 47.

48. Denies the allegations set forth in paragraph 48.

49. Applicant repeats and incorporates by reference his responses to the allegations contained in paragraphs 1 through 48, above, as if set forth in their entirety herein.

50. Denies the allegations set forth in paragraph 50.

51. Denies the allegations set forth in paragraph 51.

52. Denies the allegations set forth in paragraph 52.

53. Denies the allegations set forth in paragraph 53.

54. Denies the allegations set forth in paragraph 54.

FIRST DEFENSE

55. The Notice of Opposition fails to state a claim upon which relief can be granted.

SECOND DEFENSE

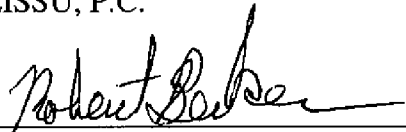
56. Opposer's claims are barred by the doctrines of laches, acquiescence, and/or estoppel.

WHEREFORE, Applicant requests that this Opposition be dismissed, and that the registration sought by Application Ser. No. 78/523,204 be granted.

Dated: New York, New York
May 22, 2006

Respectfully submitted,

FROSS ZELNICK LEHRMAN
& ZISSU, P.C.

By: 

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