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

Proceeding	91185615
Party	Defendant za za zsu
Correspondence Address	LYNDA LEWIS ZA ZA ZSU 1918 PERRY ST DURHAM, NC 27705-4810 zazazsu@gmail.com
Submission	Answer
Filer's Name	W. Swain Wood
Filer's e-mail	swain@woodcolaw.com
Signature	/W. Swain Wood/
Date	09/15/2008
Attachments	Answer to Notice of Opposition.pdf (5 pages)(226703 bytes)

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

S. CLAUDIA KOCH, d/b/a,)	
ZAZOU,)	
)	
Opposer,)	
)	Opposition No. 91185615
v.)	
)	Serial No. 77245292
ZA ZA ZSU,)	
)	
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

Applicant Za Za Zsu, LLC ("Applicant") respectfully submits the following Answer to the Opposition filed in the above-captioned action by Opposer S. Claudia Koch d/b/a Zazou ("Zazou").

Applicant responds to the correspondingly numbered paragraphs in the Notice of Opposition as follows:

1. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 1 of the Notice of Opposition.
2. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 2 of the Notice of Opposition.
3. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 3 of the Notice of Opposition.
4. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 4 of the Notice of Opposition.

5. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 5 of the Notice of Opposition.

6. Applicant admits that publicly available records confirm that trademark registration numbers 2,081,114, 2,081,233, and 2,473.536 have been cancelled.

Applicant currently lacks sufficient information to form a belief as to the truth of the remaining allegations contained in paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegation in paragraph 7 of the Notice of Opposition that “Zazou’s failure to maintain the trademark registrations has no impact on the merit of this case.” Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 7 of the Notice of Opposition.

8. Applicant denies Opposer’s allegation in paragraph 8 of the Notice of Opposition that Applicant “does not comply with the legally mandated requirements for business operation.” Applicant admits the remaining allegations contained in paragraph 8 of the Notice of Opposition.

9. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 9 of the Notice of Opposition.

10. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 10 of the Notice of Opposition.

11. Applicant currently lacks sufficient information to form a belief as to the truth of the allegations contained in paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations contained in paragraph 12 of the Notice of Opposition.

13. Applicant denies the allegations contained in paragraph 13 of the Notice of Opposition.

14. Applicant admits that it has not sought nor obtained Opposer's permission to use its Mark, and avers that there is no legal requirement for it to obtain such permission.

15. Applicant admits that Opposer has asserted a claim of fraud against Applicant, but denies the remaining allegations contained in paragraph 15 of the Notice of Opposition.

16. Applicant admits that the parties engaged in some communications prior to Opposer's filing of this action, but denies the remaining allegations contained in paragraph 16 of the Notice of Opposition.

First Claim for Relief

17. In response to paragraph 17 of the Notice of Opposition, Applicant incorporates by reference the preceding paragraphs of this Answer as if fully set forth herein.

18. Applicant denies the allegations contained in paragraph 18 of the Notice of Opposition.

Second Claim for Relief

19. In response to paragraph 19 of the Notice of Opposition, Applicant incorporates by reference the preceding paragraphs of this Answer as if fully set forth herein.

20. Applicant denies the allegations contained in paragraph 20 of the Notice of Opposition.

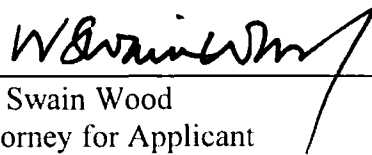
Third Claim for Relief

21. In response to paragraph 21 of the Notice of Opposition, Applicant incorporates by reference the preceding paragraphs of this Answer as if fully set forth herein.

22. Applicant denies the allegations contained in paragraph 22 of the Notice of Opposition.

WHEREFORE, Applicant respectfully requests that Opposer's Notice of Opposition for the subject application be dismissed with prejudice.

Respectfully submitted, this the 15th day of September, 2008.



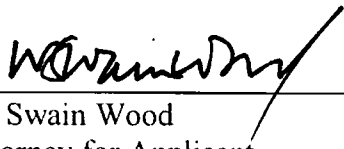
W. Swain Wood
Attorney for Applicant
WOOD LAW FIRM PLLC
301 Glenwood Avenue, Suite 280
Raleigh, NC 27603
Telephone: (919) 829-7394
Facsimile: (919) 829-7396
swain@woodcolaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Answer upon Opposer's counsel of record by depositing a copy thereof with the United States Postal Service, addressed as follows:

Megan E. Gray
Gray Matters
2017 Kalorama Road NW #3
Washington, DC 20009
Telephone: (202) 265-2738
mg@megangray.com

This the 15th day of September, 2008.



W. Swain Wood
Attorney for Applicant

WOOD LAW FIRM PLLC
301 Glenwood Avenue, Suite 280
Raleigh, NC 27603
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