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

Proceeding	91194259
Party	Plaintiff Michel Germain Parfums, Ltd.
Correspondence Address	THOMAS W. BROOKE HOLLAND & KNIGHT LLP 2099 PENNSYLVANIA AVENUE NW, SUITE 100 WASHINGTON, DC 20006 UNITED STATES thomas.brooke@hklaw.com, ptcketing@hklaw.com
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Date	06/03/2010
Attachments	michel germain resp to CC.PDF (3 pages)(57169 bytes)

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

Michel Germain Parfums, Ltd.	:	
	:	
Opposer,	:	
	:	Opposition No. 91194259
v.	:	
	:	TATTOOED BY INKY & Design
APRA International, LLC,	:	Application Serial No. 77/834,965
	:	
Applicant.	:	
	:	
Attorney Docket No. 77059/1	:	

OPPOSER'S ANSWER TO APPLICANT'S COUNTERCLAIM

Opposer Michel Germain Parfums, Ltd. ("Opposer or Michel Germain") hereby responds to the Counterclaim filed by APRA International ("Applicant" or "APRA") on May 3, 2010.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied.
7. Opposer denies that it abandoned its **TATTOO** mark for any period of time. The remaining allegations in Paragraph 7 constitute legal conclusions.
8. Opposer denies that it failed to police its mark **TATTOO**. Opposer admits that there are other US trademark registrations that include the word **TATTOO** but notes that none cover fragrances, perfumes or related products. The remaining allegations of Paragraph 8 constitute legal conclusions.

Wherefore, Opposer requests that the Board dismiss the Counterclaim of APRA International with prejudice.

Respectfully submitted,

MICHEL GERMAIN PARFUMS, LTD.

By: 
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Date: June 3, 2010

Counsel for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was furnished by U.S. Mail to:

Robert Hanlon, Esq.

Adrienne Dawn Moran, Esq.

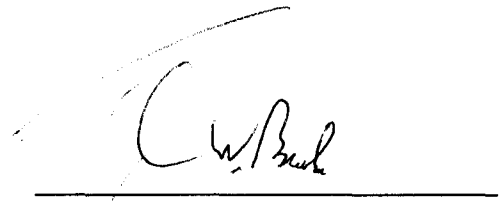
Lara A. Holzman, Esq.

Alston & Bird LLP

90 Park Ave

New York, NY 10016-1301

this 3rd day of June, 2010.

A handwritten signature in black ink, appearing to read "T. W. Brooke", is written above a solid horizontal line.

Thomas W. Brooke