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Filing date: **09/30/2011**

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

Proceeding	91200794
Party	Plaintiff Pico Manufacturing Sales Corp.
Correspondence Address	ROBERT S WEISBEIN FOLEY & LARDNER LLP 90 PARK AVENUE NEW YORK, NY 10016 UNITED STATES ptomailnewyork@foley.com, rweisbein@foley.com, tgangaram@foley.com, spippin@foley.com
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Signature	/Robert S. Wesibein/
Date	09/30/2011
Attachments	Reply to Counterclaim Jake Joseph.pdf (3 pages)(1156759 bytes)

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

Mark: JAKE JOSEPH
Serial No: 85/144,266
Filed: October 4, 2010
Published: March 22, 2011

PICO MANUFACTURING
SALES CORPORATION

Opposer,

Opposition No.: 91200794

v.

JAKE JOSEPH,

Applicant.

REPLY TO COUNTERCLAIMS

For its reply to the correspondingly numbered paragraphs of Applicant Jake Joseph's Counterclaim, Opposer Pico Manufacturing Sales Corporation, by its attorneys Foley & Lardner LLP, responds as follows:

12. Denied.
13. Opposer admits the allegations set forth in paragraph 13 of the Counterclaim.
14. Opposer admits the allegations set forth in paragraph 14 of the Counterclaim in that one of its businesses is to manufacture private label goods.
15. Opposer lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15, and therefore denies the same.
16. Denied.

17. Denied.

18. Paragraph 18 of the Counterclaim contains a conclusion of law to which no answer is required.

19. Opposer repeats and realleges the answer to paragraphs 12-18 of the Counterclaim, and incorporates the same by reference as though fully set forth herein.

20. Denied.

21. Denied.

22. Denied.

23. Paragraph 23 of the Counterclaim contains a conclusion of law to which no answer is required.

WHEREFORE, Opposer denies that Applicant is entitled to the relief requested in his Counterclaim and prays that said Counterclaim be dismissed with prejudice.

Respectfully submitted,

FOLEY & LARDNER LLP

Dated: New York, New York
September 30, 2011

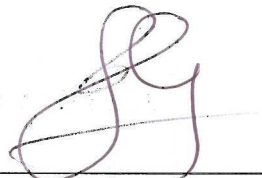
By: Robert Weisbein/
Robert S. Weisbein
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*Attorneys for Opposer
Pico Manufacturing Sales Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2011, I caused one true and complete copy of the foregoing REPLY TO COUNTERCLAIMS to be served by first-class mail upon Applicant Jake Joseph, by causing a true and complete copy thereof to be deposited in the United States mail, postage prepaid, addressed to its attorney as follows:

Erica D. Klein, Esq.
KRAMER LEVIN NAFTALIS & FRANKEL, LLP
1177 Avenue of the Americas
New York, NY 10036



Tara Gangaram