

ESTTA Tracking number: **ESTTA578011**

Filing date: **12/20/2013**

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

Proceeding	91207022
Party	Defendant Calvert Enterprises, Inc.
Correspondence Address	KONRAD GATIEN STUBBS ALDERTON & MARKILES, LLP 1453 3RD ST PROMENADE, SUITE 310 SANTA MONICA, CA 90401 UNITED STATES uspto@stubbsalderton.com, kgatien@stubbsalderton.com
Submission	Answer
Filer's Name	Konrad Gatien
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Signature	/s/
Date	12/20/2013
Attachments	Answer - 91207022.pdf(31684 bytes)

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

In re Application Nos. 85441320 and 85441324

Johnson & Johnson and)	
RoC International s.a.r.l.)	
)	Opposition No. 91207022
Opposers,)	
)	
v.)	
)	
Calvert Enterprises, Inc.,)	
)	
)	
Applicant.)	
_____)	

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant denies the allegations set forth in paragraphs 6, 9, 10, 11, 12, 13, 14, 15, 16, and 17.

Applicant admits the allegations set forth in paragraphs 1 and 2.

Applicant denies the allegations set forth in paragraphs 3, 4, 5, 7, and 8 for lack of information sufficient to form a belief as to the truth thereof.

AFFIRMATIVE DEFENSES

1. The Notice of Opposition fails to state a claim upon which relief may be granted.
2. Upon information and belief, the alleged mark “ROC” shown in Reg. No. 1,794,589, Reg. No. 2,526,440, Reg. No. 3,407,724, and Reg. No. 4,030,748 has been abandoned, in whole or in part, either through cessation of use with intent not to resume use and/or a course of conduct by Opposer, including acts of commission or omission, by which the alleged mark has lost its significance as a mark.

3. On information and belief Opposer lacks standing to oppose Applicant's mark.

Respectfully submitted,



Dated: December 20, 2013

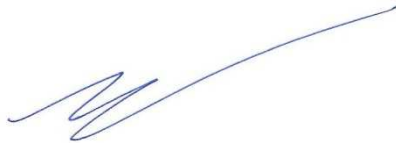
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CERTIFICATE OF SERVICE

It is hereby certified that I served a true and correct copy of the foregoing Applicant's Answer to Notice of Opposition on Opposers and their correspondent of record, Jaye S. Campbell, Drinker Biddle & Reath LLP, 1500 K Street, N.W., Suite 1100, Washington, DC 20005, by placing a true and correct copy thereof in a sealed envelope, postage prepaid, in First Class U.S. mail, for collection and mailing with the United States Postal Service on this 20th day of December 2013.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 20, 2013, at Santa Monica, California



Konrad Gatien