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

Proceeding	91216055
Party	Defendant hoplite athletics llc
Correspondence Address	HOPLITE ATHLETICS LLC HOPLITE ATHLETICS LLC 558 OLD STAMFORD RD NEW CANAAN, CT 06840-6616 carras@rhoneapparel.com;carras.holmstea
Submission	Answer
Filer's Name	Luke McGrath
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Date	06/02/2014
Attachments	Answer to Notice of Opposition.pdf(33566 bytes)

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

RAGNAR EVENTS, LLC)	
)	
Petitioner,)	
)	
v.)	¹ Opposition No. 91216055
)	
HOPLITE ATHLETICS,LLC)	
)	
Applicant)	
)	

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant, Hoplite Athletics, LLC, for its answer to the Notice of Opposition filed by Ragnar Events, LLC against application for registration of Applicant’s trademark RHONE, Serial No. 86006981, filed on July 10, 2013 and published in the Official Gazette on December 24, 2013, pleads and avers as follows:

1. Applicant admits the allegations contained in ¶ 1.
2. Applicant denies knowledge and information sufficient to admit or deny the allegations contained in ¶ 2.
3. Applicant denies each and every allegation contained in ¶ 3. Applicant further affirmatively alleges that Applicant never actively sought sponsorship, affiliation, or endorsement with Opposer, but instead had a single phone call with them.
4. Applicant denies each and every allegation contained in ¶ 4, and affirmatively alleges that Opposer was not unwilling to sponsor or endorse Applicant’s clothing. On the contrary, Applicant was contacted by Opposer in July to have an in person meeting, which

¹ Opposer’s Notice of Opposition improperly contained a placeholder for a “Cancellation No.” instead of an “Opposition No.”

meeting never occurred due to scheduling conflicts. Applicant and Opposer never spoke on the subject again. Furthermore, Applicant never intended to license Opposer's design.

Applicant further affirmatively alleges that Applicant's trademark, and its original design sketches and iterations therefrom were created and developed by a third-party design firm.

Opposer and its mark were never discussed by Applicant and the third-party design firm.

Applicant further affirmatively alleges that Applicant's mark was finalized in May or June 2013, before Applicant was contacted by Opposer.

5. Applicant denies knowledge and information sufficient to admit or deny the allegations contained in ¶ 5.

6. Applicant denies each and every allegation contained in ¶ 6.

7. Applicant denies each and every allegation contained in ¶ 7.

8. Applicant denies each and every allegation contained in ¶ 8.

9. Applicant denies each and every allegation contained in ¶ 9.

WHEREFORE, Applicant requests that the notice of opposition be denied.

Respectfully submitted,

Hoplite Athletics LLC

Dated: June 2, 2014

By: /Luke McGrath/
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Attorneys for Applicant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is the attorney for Applicant, Hoplite Athletics, LLC, in the above-captioned Opposition proceeding, and that on the date which appears below, he caused a copy of the foregoing ANSWER TO NOTICE OF OPPOSITION to be served on the following by first class mail service.

Opposer:

Stephen J. Trayner
Casey W. Jones
Strong & Hanni, P.C.
102 South 200 East, Suite 800
Salt Lake City, UT 84111
(801) 532-7080

Dated: June 2, 2014

By: /Luke McGrath/
Luke McGrath