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

Proceeding	91216411
Party	Defendant Adnan, Ibrahim
Correspondence Address	ADNAN IBRAHIM 3550 BARRON WAY RENO, NV 89511-1848 adnan7321@gmail.com
Submission	Answer
Filer's Name	Ibrahim Adnan
Filer's e-mail	adnan7321@gmail.com
Signature	/Ibrahim Adnan/
Date	06/23/2014
Attachments	Answer to notice of opposition.pdf(335718 bytes)

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

APRIL HARTSOOK LLC,)	Opposition No: 91216411
a North Carolina corporation)	
)	Application Serial No.: 86001367
Opposer,)	
)	Published in the Official Gazette on
v.)	April 15, 2014
)	
Ibrahim Adnan)	
d/b/a American Husstle Clothing Company)	
An Individual)	
)	

Applicant.

THE PARTIES

- 1.) Opposer is a corporation incorporated in the State of North Carolina, with a business address of P.O Box 11774, Winston Salem, North Carolina 27116
- 2.) Ibrahim Adnan is an individual d/b/a American Husstle Clothing Company a corporation incorporated in the State of Nevada, with a business address of 3550 Barron Way, Reno, Nevada 89511.

APPLICANTS ANSWER TO NOTICE OF OPPOSITION

Applicant, Ibrahim Adnan d/b/a American Husstle Clothing Company for its/ his answer to the notice of Opposition filed by April Hartsook LLC against application for registration of Ibrahim Adnan trademark for the mark: AH and Design, Serial No. 86001367 filed July 02, 2013 and published in the Official Gazette of April 15, 2014, pleads and avers as follows:

- 1.) Answering paragraph 1 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations.
- 2.) Answering paragraph 2 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations.
- 3.) Answering paragraph 3 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations.
- 4.) Answering paragraph 4 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations.
- 5.) Answering paragraph 5 of the notice of Opposition Applicant, based on the Exhibit A, affirms that opposer has filed an application. Applicant however does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations. Applicant further states that applicant first filed application serial no 86001367 on July 2nd 2013; the trade mark examining attorney assigned to applicants had first suspended the application on the grounds of a prior pending application citing conflict in the mark if the prior application was approved. Applicant then approached the prior applicant and bought the right and prior applicant filed the abandonment of the mark. Applicant has since investment considerable sums of money to manufacture, market the product line on a national basis.
- 6.) Answering paragraph 6 denies that opposer has any ownership of the Trade mark does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations. Applicant further states that applicant first filed application serial no 86001367 on July 2nd 2013; the trade mark examining attorney

assigned to applicants had first suspended the application on the grounds of a prior pending application citing conflict in the mark if the prior application was approved. Applicant then approached the prior applicant and bought the right and prior applicant filed the abandonment of the mark. Applicant has since investment considerable sums of money to manufacture, market the product line on a national basis. Opposer has failed to make any attempt to register this mark prior to this opposition and does not have any "well-known" brand recognition.

- 7.) Answering paragraph 7 of the notice of Opposition Applicant Does admit the allegation that applicant seeks to register a mark "AH". Applicant denies all other allegations
- 8.) Answering paragraph 8 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations
- 9.) Answering paragraph 9 of the notice of Opposition Applicant does not have sufficient knowledge of information to form a belief as to the allegation contained therein and accordingly denies the allegations.
- 10.) Answering paragraph 10 of the notice of Opposition Applicant admits the allegation thereof.

Respectfully submitted,

/Ibrahim Adnan/
3550 Barron way
Reno, NV 89511
Telephone: (732) 770-0965

CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing answer to **NOTTICE OF OPPOSITION** upon the opposer by depositing a copy in the United States Mail, postage pre-paid, and addressed as follows:

Zaneta M. Robinson
Blanco Tackaberry
& Matamoros, P.A
P.O Drawer 25008
Winston-Salem, NC 27114-5008
Address of Record

This is the 23th day of May, 2014.

/Ibrahim Adnan/

Ibrahim Adnan
3550 Barron Way
Reno, NV 89511