

ESTTA Tracking number: **ESTTA638992**

Filing date: **11/14/2014**

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

Proceeding	91219266
Party	Defendant Target Brands, Inc.
Correspondence Address	RENEE S. KRAFT TARGET BRANDS, INC. 1000 NICOLLET MALL MINNEAPOLIS, MN 55403-2542  us.trademarks@target.com
Submission	Answer
Filer's Name	James R. Steffen
Filer's e-mail	tmmpls@faegrebd.com, james.steffen@faegrebd.com
Signature	/James R Steffen smh/
Date	11/14/2014
Attachments	Answer.pdf(101954 bytes )

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

In the Matter of Application Serial No. 86/257,476  
For the Mark: SPR!TZ (stylized)  
Filed: April 21, 2014  
Published: September 9, 2014

_____	)	
SHEN MANUFACTURING CO., INC.,	)	Opposition No. 91219266
	)	
Opposer,	)	
	)	
v.	)	<b><u>ANSWER TO</u></b>
	)	<b><u>NOTICE OF OPPOSITION</u></b>
	)	
TARGET BRANDS, INC.	)	
	)	
Applicant.	)	
_____	)	

For its Answer to the Notice of Opposition of Shen Manufacturing Co., Inc. (“Opposer”), applicant Target Brands, Inc. (“TBI”), a Minnesota corporation having its principal place of business at 1000 Nicollet Mall, Minneapolis, MN 55403, answers and alleges as follows. Except as hereinafter expressly admitted, qualified or otherwise answered, TBI denies each and every allegation, matter, statement and thing asserted in Opposer’s Notice of Opposition (the “Notice”).

1. TBI admits the allegations of paragraph 1 of the Notice.
2. TBI denies the allegation of the final sentence of paragraph 2 of the Notice. TBI is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 2 of the Notice.
3. TBI denies the allegation of the final sentence of paragraph 3 of the Notice. TBI is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 3 of the Notice.

4. TBI denies the allegation of the final sentence of paragraph 4 of the Notice. TBI is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 4 of the Notice.

5. TBI denies the allegation of the final sentence of paragraph 5 of the Notice. TBI is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 5 of the Notice.

6. TBI denies the allegation of the final sentence of paragraph 6 of the Notice. TBI is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 6 of the Notice.

7. TBI denies the allegations of paragraph 7 of the Notice on information and belief.

8. TBI denies the allegations of paragraphs 8, 9 and 10 of the Notice.

#### AFFIRMATIVE DEFENSE

1. The Notice of Opposition fails to state a claim upon which relief may be granted.

WHEREFORE, TBI prays that Opposer's Notice of Opposition be dismissed with prejudice and on the merits.

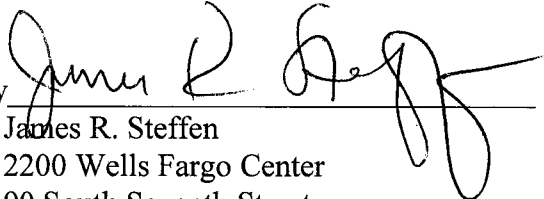
Consistent with Trademark Rule 2.18, please address all correspondence relating to the above-captioned opposition proceeding to:

James R. Steffen  
Faegre Baker Daniels LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600  
E-mail: [james.steffen@faegrebd.com](mailto:james.steffen@faegrebd.com); [sarah.house@faegrebd.com](mailto:sarah.house@faegrebd.com)

No fees are seen to be due in connection with the filing of this Answer to Notice of Opposition; however, if it is determined that any such fees are due, the Commissioner may charge them to Deposit Account No. 06-0029.

Dated: November 14, 2014

**FAEGRE BAKER DANIELS LLP,**  
as Attorneys for Applicant

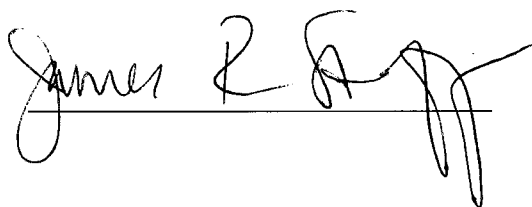
By   
James R. Steffen  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, Minnesota 55402  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600  
Email: [james.steffen@faegrebd.com](mailto:james.steffen@faegrebd.com)

CERTIFICATE OF SERVICE

I, James R. Steffen, do hereby certify that a true and correct copy of the above and foregoing document has been forwarded by United States mail, first class, postage prepaid, to:

John F. A. Earley III  
Harding, Earley, Follmer & Frailey, P.C.  
86 the Commons at Valley Forge East  
1288 Valley Forge Road  
Valley Forge, PA 19482-0750

as representative of Opposer, this 14th day of November, 2014.

A handwritten signature in black ink, appearing to read "James R. Steffen", is written over a horizontal line. The signature is cursive and somewhat stylized.

US.55215211.01