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

Proceeding	91219554
Party	Defendant Andrew Walker and Cassandra Troy Walker
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Submission	Answer
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Date	01/06/2015
Attachments	Answer to Opp. No. 91219554.pdf(109344 bytes)

6. Admitted that Opposer appears to maintain registrations for the mark CLOVER STORNETTA and CLOVER ORGANIC FARMS. As Applicant is without sufficient knowledge or information to form a belief as to the remaining allegations contained in Paragraph 6, Applicant denies the same.

7. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 7 of the Notice and therefore denies the same.

8. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 8 of the Notice and therefore denies the same.

9. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 9 of the Notice and therefore denies the same.

10. Denied.

11. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 11 of the Notice and therefore denies the same.

12. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 12 of the Notice and therefore denies the same.

13. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 13 of the Notice and therefore denies the same.

14. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 14 of the Notice and therefore denies the same.

15. Denied.

15. (Second Paragraph) Denied.

Applicant denies that Opposer is entitled to any relief, including the relief sought in the WHEREFORE clause of its Notice.

AFFIRMATIVE DEFENSES

16. Opposer's Opposition is barred because Opposer's marks CLOVER STORNETTA and CLOVER ORGANIC FARMS are sufficiently dissimilar to Applicants' Mark CLOVER and Design (CLOVER disclaimed).

17. Opposer's Opposition is barred because Opposer's marks CLOVER STORNETTA and CLOVER ORGANIC FARMS are weak and entitled to a narrow scope of protection as evidenced by third parties using similar CLOVER marks for similar goods.

PRAYER FOR RELIEF

WHEREFORE, Applicant contends that the Notice is without grounds and requests judgment denying the Opposition and this proceeding in its entirety with prejudice, and for such other and further relief as the Board deems just and proper.

Dated: January 6, 2015

Respectfully submitted,

By: 

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CERTIFICATE OF FILING AND SERVICE

The undersigned hereby certifies that a true copy of the foregoing ANSWER is being filed electronically with the United States Patent and Trademark Office Trademark Trial and Appeal Board and being served by First Class Mail, postage prepaid, on January 6, 2015, on the following:

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