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Filing date: **10/24/2016**

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

Proceeding	91226909
Party	Defendant Twin-Star International, Inc.
Correspondence Address	Gregory S. Gewirtz Lerner, David, Littenberg, Krumholz & Mentlik 600 South Avenue West Westfield, NJ 07090 UNITED STATES gparadise@lernerdavid.com,litigation@lernerdavid.com
Submission	Answer
Filer's Name	Gregg Paradise
Filer's e-mail	gparadise@lernerdavid.com,litigation@lernerdavid.com
Signature	/Gregg A Paradise/
Date	10/24/2016
Attachments	Answer-14.pdf(10982 bytes)

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

2D2C, Inc.,	:	
	:	
	:	Mark: SAFER PLUG & Design
	:	
Opposer,	:	Serial Number: 86/454,732
	:	
v.	:	
	:	Opposition No. 91226909
Twin-Star International, Inc.,	:	
	:	
Applicant.	:	
	:	
	x	

ANSWER TO NOTICE OF OPPOSITION

In answer to the Notice of Opposition for the above-referenced matter, applicant Twin-Star International, Inc., a Florida corporation with a business address of 1690 S. Congress Avenue, Suite 210, Delray Beach, Florida 33445 (“Applicant”), through its undersigned counsel states as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.

6. Admitted.

7. Admitted, however, Applicant states that no authorization or consent was necessary.

8. Applicant admits that it uses or intends to use its SAFER PLUG mark/logo in connection with the goods recited in Application Serial No. 86/454,732, but otherwise denies the allegations of this paragraph.

9. Denied.

10. Denied.

11. Denied.

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and therefore denies the allegations.

13. Denied.

14. Denied.

FIRST AFFIRMATIVE DEFENSE

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

WHEREFORE, Applicant requests that the Notice of Opposition be dismissed, and that Applicant's Trademark Application Serial No. 86/454,732 be allowed.

Respectfully Submitted,
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP

Dated: October 24, 2016

By: s/ Gregg A. Paradise
Gregg A. Paradise
600 South Avenue West
Westfield, NJ 07090-1497
Tel: 908.654.5000
Fax: 908.654.7866
E-mail: gparadise@lernerdavid.com;
litigation@lernerdavid.com

Attorneys for Applicant
Twin-Star International, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the within ANSWER TO NOTICE OF OPPOSITION was served upon the following counsel of record this 24th day of October, 2016, as follows:

VIA E-MAIL

Kevin S. Sprecher, Esq.
Clark Hill PLC
150 North Michigan Avenue, Suite 2700
Chicago, IL 60601
ksprecher@clarkhill.com

s/Gregg A. Paradise
Gregg A. Paradise

TWIN 10.2A-003 (14)
Opposition No. 91226909