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

Proceeding	91229249
Party	Defendant T.R.B. International SA
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Date	06/02/2017
Attachments	Answer.pdf(111682 bytes )

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

Opposition No.: 91229249  
Applicant: T.R.B International SA  
Serial No.: 79/169,426  
Filed: May 7, 2015



Mark:   
Published: March 29, 2016

**APPLICANT'S ANSWER**

Applicant T.R.B. International SA (“Applicant”) files its Answer to Opposer Certina A.G. (Certina S.A.) (Certina Ltd.)’s (“Opposer”) Notice of Opposition and would show the following:

1) Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1, which has the effect of a denial.

2) Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2, which has the effect of a denial.

3) Applicant admits that the trademarks  and  are registered in the United States with the U.S. Patent and Trademark Office, under Reg. Nos. 4,600,118 and 4,739,714, respectively. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 3, which has the effect of a denial.

4) Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4, which has the effect of a denial.

5) Paragraph 5 states a legal conclusion which does not present an allegation against Applicant suitable for admission or denial. To the extent Paragraph 5 contains allegations requiring a substantive response, they are denied.

6) Applicant denies the allegations contained in Paragraph 6.

7) Applicant denies the allegations contained in Paragraph 7.

8) Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8, which has the effect of a denial.

9) Applicant denies the allegations contained in Paragraph 9.

10) Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10 regarding the nature of Opposer's use of Opposer's marks or channels of distribution, which has the effect of a denial. Applicant denies the remainder of the allegations contained in Paragraph 10.

11) Applicant denies the allegations contained in Paragraph 11.

Applicant denies that Opposer is entitled to any of the relief prayed for in its Notice of Opposition. All allegations made in Opposer's Notice of Opposition that are not expressly admitted above are denied.

Dated: June 2, 2017

Respectfully submitted,

/Christopher M. Weimer/

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**CERTIFICATE OF SERVICE**

I, Christopher M. Weimer, hereby certify that a true and complete copy of the foregoing Applicant's Answer has been served on Opposer by forwarding said copy on June 2, 2017, via email to:

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By: /Christopher M. Weimer  
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