

ESTTA Tracking number: **ESTTA799520**

Filing date: **02/06/2017**

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

| | |
|------------------------|---|
| Proceeding | 91231958 |
| Party | Defendant Amorepacific Corporation |
| Correspondence Address | SOFIA JEONG, TROUTMAN SANDERS LLP 600 PEACHTREE STREET NE, SUITE 5200 ATLANTA, GA 30308 trade- marks@troutmansanders.com;sofia.jeong@troutmansanders.com;ivy.knowles@troutmansanders.com |
| Submission | Answer |
| Filer's Name | SOFIA JEONG |
| Filer's e-mail | trademarks@troutmansanders.com, sofia.jeong@troutmansanders.com |
| Signature | /sj/ |
| Date | 02/06/2017 |
| Attachments | Answer.pdf(141847 bytes) |

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

| | | |
|---------------------------|---|-------------------------------------|
| PRIMAVERA LIFE GMBH, |) | |
| |) | |
| Opposer, |) | Opposition No. 91231958 |
| |) | |
| v. |) | Mark: PRIMERA (Serial No. 86873750) |
| |) | |
| AMOREPACIFIC CORPORATION, |) | |
| |) | |
| Applicant. |) | |
| |) | |

APPLICANT’S ANSWER

Applicant Amorepacific Corporation (“Applicant”) hereby answers the Notice of Opposition filed in the above-styled action (the “Opposition”) by Opposer Primavera Life GmbH (“Opposer”).

Responding to the unnumbered introductory paragraph, Applicant denies that Opposer will be damaged by the registration of the mark PRIMERA (Serial No. 86873750) (“Applicant’s Mark”). The remaining averments in the unnumbered paragraph are admitted.

1. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 1 of the Notice, and therefore, denies the same.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 2 of the Notice, and therefore, denies the same.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 3 of the Notice, and therefore, denies the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 4 of the Notice, and therefore, denies the same.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 5 of the Notice, and therefore, denies the same.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 6 of the Notice, and therefore, denies the same.

7. Applicant incorporates its responses to Paragraphs 1-6 of the Notice.

8. Applicant admits the citizenship of the Applicant but denies the address of the Applicant.

9. Admitted.

10. Applicant incorporates its responses to Paragraphs 1-10 of the Notice.

11. Denied.

12. Applicant admits the goods listed in Opposer's Registration No. 3632484 but denies the remaining allegations in Paragraph 12 as Applicant is without knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in Paragraphs 12 of the Notice.

13. Denied.

14. Denied.

15. Denied.

16. Admitted.

17. Denied.

18. Denied.

Responding to the unnumbered concluding prayer, Applicant denies that the relief requested by Opposer is warranted in the instant case. Except as set forth herein, all other paragraphs, headings, and all other allegations contained in the Notice are denied.

This 6th day of January 2017.

Respectfully submitted,

TROUTMAN SANDERS LLP

/s/Sofia Jeong _____

Sofia Jeong

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| |) | |
| Applicant. |) | |
| |) | |

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing ANSWER was sent via email to Opposer's attorney as follows:

Patrick J. Concannon
Nutter, McClennen & Fish, LLP
Seaport West 155 Seaport Boulevard
Boston, MA 02210
UNITED STATES
docket@nutter.com, pconcannon@nutter.com

This 6th day of January 2017.

/s/Sofia Jeong