

ESTTA Tracking number: **ESTTA860483**

Filing date: **11/24/2017**

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

Proceeding	91236215
Party	Defendant Valerie Jones, Leslie Stallworth
Correspondence Address	VALERIE JONES 10 FORD CT SICKLERVILLE, NJ 08081-9217 UNITED STATES Email: valjones52@gmail.com
Submission	Answer
Filer's Name	Valerie Jones
Filer's email	Valjones52@gmail.com
Signature	/Valerie Jones/
Date	11/24/2017
Attachments	Answer to Opposition 91189782.pdf(140042 bytes)

1 6. Applicant's mark and Opposer's mark create different
2 commercial impressions.

3 7. Applicant's first use in commerce, March 24, 2016.

4 8. Opposer's mark is one word.

5 9. Applicant's mark solely present femininity.

6 10. Applicants mark and Opposer's mark are not likely to
7 cause confusion, mistake or deception to purchasers as to
8 the source of Opposer's goods or services.
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12 WHEREFORE, Applicant respectfully requests and pray that the
13 Trademark Trial and Appeal Board deny the Opposition and permit
14 registration of Applicant's proposed mark in Application Serial Number
15 86969284 in the United States Patent and Trademark Office.

16 Dated this 24rd day of November 2017.
17

18 Respectfully submitted,

19 By: /Valerie Jones/Leslie Stallworth/
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the above and foregoing Answer to Notice of
3 Opposition has been served on the following by delivering said copy on
4 November 24, 2017, via email to Opposer at the following email
5 addresses:
6

7
8 Tarek Kirschen
9 Miami Fashion Factory LLC
10 Email: tk@pumpdwear.com, tk@pumpdwater.com, tk@pumpd.co

11 By: /Valerie Jones/Leslie Stallworth/
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