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Filing date: **01/03/2018**

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

Proceeding	91237760
Party	Plaintiff Holy City Skin Products, LLC
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Submission	Answer to Counterclaim
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Signature	/Natalma M. McKnew/
Date	01/03/2018
Attachments	Answer to Counterclaim.pdf(11075 bytes )

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

Holy City Skin Products, LLC,	)	Opposition No. 91237760
	)	
Opposer	)	Trademark App. No. 87/328,055
	)	
v.	)	Mark: TURN YOUR BATHROOM INTO
	)	A PROFIT CENTER
Secret of the Islands, Inc.,	)	
	)	Published in the <i>Official Gazette</i> on
_____ Applicant.	)	October 24, 2017.

**OPPOSER’S REPLY TO APPLICANT’S COUNTERCLAIM**

Opposer Holy City Skin Products, LLC replies to the Counterclaim asserted by Applicant Secret of the Islands, Inc. as follows:

Applicant fails to state a claim upon which relief can be granted, as set forth in Rule 12(b)(6), Federal Rules of Civil Procedure, in that, *inter alia*:

1. The asserted counterclaim is not cognizable in a proceeding before the Trademark Trial and Appeals Board; and
2. Holy City Skin Products, LLC’s opposition in this proceeding constitutes reasonable and protected activity consistent with the jurisdiction of this tribunal and applicable legal precepts; and
3. Neither damages nor attorneys’ fees are cognizable in this Proceeding.

Opposer reserves the right to assert additional defenses and objections as appropriate.

Respectfully submitted,

/Natalma M. McKnew/

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Dated: January 3, 2018

*ATTORNEYS FOR OPPOSER HOLY CITY SKIN  
PRODUCTS, LLC*

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**CERTIFICATE OF MAILING**

I hereby certify that a true and complete copy of the foregoing OPPOSER’S REPLY TO APPLICANT’S COUNTERCLAIM has been served on the attorney of record for Holy City Skin Products, LLC on January 3, 2018 via email and U.S. Mail, postage prepaid to:

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