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

Proceeding	91238574
Party	Defendant Protective Insurance Company
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Signature	/Charles J. Meyer/
Date	01/31/2018
Attachments	Answer_007643-000002.pdf(7199 bytes )

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

In re application Serial No. 87/440,152  
For the mark Shield Design

Grinnell Mutual Reinsurance Company,	)	Opposition No. 91238574
	)	
Opposer,	)	
	)	
v.	)	
	)	
Protective Insurance Company	)	
	)	
Applicant.	)	

**ANSWER TO NOTICE OF OPPOSITION**

In response to the Notice of Opposition filed on December 22, 2017 by Opposer, Grinnell Mutual Reinsurance Company (“Opposer”), Applicant, Protective Insurance Company (“Applicant”), hereby answers as follows:

1. Admitted.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and therefore denies such allegations.
3. Admitted.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Notice of Opposition and therefore denies such allegations.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Notice of Opposition and therefore denies such allegations.

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

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Notice of Opposition and therefore denies such allegations.

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of the Notice of Opposition and therefore denies such allegations.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9 of the Notice of Opposition and therefore denies such allegations.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10 of the Notice of Opposition and therefore denies such allegations.

11. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the Notice of Opposition and therefore denies such allegations.

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of the Notice of Opposition and therefore denies such allegations.

13. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the Notice of Opposition and therefore denies such allegations.

14. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the Notice of Opposition and therefore denies such allegations.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and therefore denies such allegations.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Paragraph 34 is not an allegation to which a response is required, but to the extent necessary Applicant repeats its responses to paragraphs 1-33.

35. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 35 of the Notice of Opposition and therefore denies such allegations.

36. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 36 of the Notice of Opposition and therefore denies such allegations.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

WHEREFORE, Applicant requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition with prejudice and that Application Serial No. 87/440,152 be allowed.

Respectfully submitted,

By /Charles J. Meyer/  
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Attorney for Applicant

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via email to:

Sarah J. Gayar  
Nyemaster Goode, P.C.  
625 First Street SE, Suite 400  
Cedar Rapids, IA 52401  
[sjgayer@nyemaster.com](mailto:sjgayer@nyemaster.com)

on this January 31, 2018.

By: /Charles J. Meyer/  
Attorney for Applicant