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Filing date: **12/19/2018**

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

Proceeding	91245120
Party	Defendant CALDERA + LAB, LLC
Correspondence Address	Ben T. Lila MANDOUR & ASSOCIATES, APC 8605 SANTA MONICA BLVD., SUITE 1500 LOS ANGELES, CA 90069 UNITED STATES jmandour@mandourlaw.com, blila@mandourlaw.com 8584879300
Submission	Answer
Filer's Name	Ben T. Lila
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Signature	/Ben T. Lila/
Date	12/19/2018
Attachments	Answer CALDERA plus LAB 12-19-18.pdf(94361 bytes )

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

In the Matter of Application Serial No. 87/842,002  
for the mark CALDERA LAB  
Published in the Official Gazette on: September 4, 2018

S. C. Johnson & Sons, Inc.,	)	
	)	
Opposer,	)	Opposition No. 91245120
	)	
v.	)	
	)	
Caldera + Lab, LLC,	)	
	)	
Applicant.	)	
	)	

**APPLICANT CALDERA + LAB, LLC, LLC'S ANSWER  
TO S. C. JOHNSON & SONS, INC.'S NOTICE OF OPPOSITION**

Caldera + Lab, LLC ("Applicant") hereby answers Opposer S. C. Johnson & Sons, Inc.'s Notice of Opposition as follows:

1. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 1 of the Notice of Opposition and on that basis denies said allegations.
2. Applicant admits the pleaded registrations speak for themselves. Applicant is unaware of information sufficient to respond as to the truth or falsity of the remaining allegations of Paragraph 2 of the Notice of Opposition and on that basis denies said allegations.
3. Applicant admits U.S. Trademark Registration No. 2,576,570 speaks for itself.
4. Denied.
5. Denied.

6. Admit.
7. Applicant admits U.S. Trademark Serial No. 87/842,002 speaks for itself.
8. Admit.
9. Admit.
10. Applicant admits U.S. Trademark Serial No. 87/842,002 speaks for itself.
11. Applicant admits Opposer purports to not give its consent. Applicant denies it requires Opposer's consent.
12. Denied.
13. Applicant admits U.S. Trademark Serial No. 87/842,002 speaks for itself.
14. Denied.
15. Applicant admits opposer and applicant's trademarks speak for themselves.
16. Applicant admits opposer and applicant's trademarks speak for themselves.
17. Applicant admits opposer and applicant's trademarks speak for themselves.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.

25. Denied.
26. Denied.
27. Denied.
28. Denied.

WHEREFORE, Applicant respectfully requests that:

- (1) Opposer take nothing by its Notice of Opposition;
- (2) the Opposer be dismissed with prejudice; and
- (3) the Board grant such further relief as the Board may deem just.

Respectfully submitted,

Date: December 19, 2018

/Ben T. Lila/  
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Attorneys for Applicant,  
Caldera + Lab, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the below date a copy of the foregoing APPLICANT CALDERA + LAB, LLC, LLC'S ANSWER TO S. C. JOHNSON & SONS, INC.'S NOTICE OF OPPOSITION has been served via email on the following:

Christopher B. Lay  
IpHorgan Ltd  
195 Arlington Heights Rd., Suite 125  
Buffalo Grove, IL 60089  
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Date: December 19, 2018

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/Ben T. Lila/  
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Attorneys for Applicant,  
Caldera + Lab, LLC