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

Proceeding	91245537
Party	Defendant Planet Bingo, Inc.
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Oneida Nation, Opposer, v. Planet Bingo, Inc., Applicant.	Opposition No. 91/245,537 Marks: JUMBO7 (87/ 945,357) SUPER X-TRA KASH (87/945,397) THREE SISTERS (88/036,911) BINGO OR BETTER (87/945,338) PLANETDOWNS (87,945/380) Filing Dates: Various Published: October 30, 2018 VIA ESTTA General Filings

Applicant Planet Bingo, Inc.'s Answer to Opposer Oneida Nation's Notice of Opposition

Pursuant to TMBP § 311, Applicant Planet Bingo, Inc. ("Applicant"), the owner of record of (i) Ser. No. 87/945,357 filed June 1, 2018 for "JUMBO7" ("the '357 Mark") in class 028 for Bingo cards and Bingo game playing equipment ("Applicant's Goods"); (ii) Ser. No. 87/945,397 filed June 1, 2018 for "SUPER X-TRA KASH" ("the '397 Mark") in class 028 for Applicant's Goods; (iii) Ser No. 88/036,911 filed July 13, 2018 for "THREE SISTERS" ("the '911 Mark") for Applicant's Goods; (iv) Ser. No. 87/945,338 filed June 1, 2018 for "BINGO OR BETTER" ("the '338 Mark") for Applicant's Goods; and (v) Ser. No. 87,945/380 filed June 1, 2018 for "PLANETDOWNS" ("the '380 Mark", hereinafter, this mark and the '911 Mark, '338 Mark, '397 Mark, and '357 Mark collectively referred to as "Applicant's Marks") for Applicant's Goods, hereby respectfully submits its Answer to Opposer Oneida Nation's ("Opposer") Notice of Opposition.

1. Admitted.

2. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 2, and therefore denies the same.

3. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 3, and therefore denies the same.

4. Admitted.

5. Admitted.

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

7. Admitted.

8. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 8, and therefore denies the same.

9. Admitted.

10. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 10, and therefore denies the same.

11. Admitted.

12. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 12, and therefore denies the same.

13. Admitted.

14. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 14, and therefore denies the same.

15. Admitted.

16. Admitted.

17. Applicant admits that it filed trademark applications for Applicant's Marks in June and July 2018, but deny the remaining allegations of Paragraph 17.

18. Admitted.

19. Denied.

Applicant's Marks

The '397 Mark – SUPER X-TRA KASH

20. Admitted.

21. Admitted.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Applicant admits that Mr. Farley I. Weiss submitted a verification and signature pursuant to TMEP §§ 804 and 611 and 37 C.F.R. § 2.193, 37 C.F.R. § 11.18, and any other relevant regulations cited therein with the application for the '397 Mark, but deny the implication of the allegations of Paragraph 26 that such verification and signature attesting to the '397 Mark, at the time of submission, was known by Applicant and Mr. Weiss to be false.

The '911 Mark – THREE SISTERS

27. Admitted.

28. Admitted.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

33. Applicant admits that Mr. Farley I. Weiss submitted a verification and signature pursuant to TMEP §§ 804 and 611 and 37 C.F.R. § 2.193, 37 C.F.R. § 11.18, and any other relevant regulations cited therein with the application for the '911 Mark, but deny the implication of the allegations of Paragraph 33 that such verification and signature attesting to the '911 Mark, at the time of submission, was known by Applicant and Mr. Weiss to be false.

The ’338 Mark – BINGO OR BETTER

34. Admitted.

35. Admitted.

36. Denied.

37. Denied.

38. Denied.

39. Applicant admits that Mr. Farley I. Weiss submitted a verification and signature pursuant to TMEP §§ 804 and 611 and 37 C.F.R. § 2.193, 37 C.F.R. § 11.18, and any other relevant regulations cited therein with the application for the ’338 Mark, but deny the implication of the allegations of Paragraph 39 that such verification and signature attesting to the ’338 Mark, at the time of submission, was known by Applicant and Mr. Weiss to be false.

The ’357 Mark – JUMBO7

40. Admitted.

41. Admitted.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Applicant admits that Mr. Farley I. Weiss submitted a verification and signature pursuant to TMEP §§ 804 and 611 and 37 C.F.R. § 2.193, 37 C.F.R. § 11.18, and any other relevant regulations cited therein with the application for the ’357 Mark, but deny the implication of the allegations of Paragraph 46 that such verification and signature attesting to the ’357 Mark, at the time of submission, was known by Applicant and Mr. Weiss to be false.

The ’380 Mark – PLANETDOWNS

47. Admitted.

48. Admitted.

49. Denied.

50. Denied.

51. Denied.

52. Applicant admits that Mr. Farley I. Weiss submitted a verification and signature pursuant to TMEP §§ 804 and 611 and 37 C.F.R. § 2.193, 37 C.F.R. § 11.18, and any other relevant regulations cited therein with the application for the ’380 Mark, but deny the implication of the allegations of Paragraph 52 that such verification and signature attesting to the ’380 Mark, at the time of submission, was known by Applicant and Mr. Weiss to be false.

Opposer’s Purported Trademarks and Registration Applications

Opposer’s Purported SUPER X-TRA KASH Trademark, Ser. No. 88/129,417 (“the ’417 Mark”)

53. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 53, and therefore denies the same.

54. Admitted.

55. Admitted.

56. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 56 and therefore denies the same.

57. Applicant admits that Opposer states in the referenced application that it first used SUPER X-TRA KASH at least by Dec. 31, 1994, but is without knowledge or information sufficient to form a belief about the truth of the underlying allegation concerning the actual date of first use or date of first use in commerce referenced in Paragraph 57 and therefore denies the same.

58. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 58 and therefore denies the same.

59. Denied.

60. Admitted except Applicant denies the allegations of Paragraph 60 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

61. Admitted except Applicant denies the allegations of Paragraph 61 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

Opposer's Purported THREE SISTERS Trademark, Ser. No. 88/129,435 ("the '435 Mark")

62. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 62, and therefore denies the same.

63. Admitted.

64. Admitted.

65. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 65, and therefore denies the same.

66. Applicant admits that Opposer states in the referenced application that it first used THREE SISTERS at least by Jan. 15, 1996, but is without knowledge or information sufficient to form a belief about the truth of the underlying allegation concerning the actual date of first use or date of first use in commerce referenced in Paragraph 66 and therefore denies the same.

67. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 67 and therefore denies the same.

68. Denied.

69. Admitted except Applicant denies the allegations of Paragraph 69 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

70. Admitted except Applicant denies the allegations of Paragraph 70 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

Opposer's BINGO OR BETTER Trademark, Ser. No. 88/129,451 ("the '451 Mark")

71. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 71 and therefore denies the same.

72. Admitted.

73. Admitted.

74. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 74 and therefore denies the same.

75. Applicant admits that Opposer states in the referenced application that it first used BINGO OR BETTER at least by Dec. 13, 1997, but is without knowledge or information sufficient to form a belief about the truth of the underlying allegation concerning the actual date of first use or date of first use in commerce referenced in Paragraph 75 and therefore denies the same.

76. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 76 and therefore denies the same.

77. Denied.

78. Admitted except Applicant denies the allegations of Paragraph 78 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

79. Admitted except Applicant denies the allegations of Paragraph 79 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

Opposer's JUMBONEIDA Trademark, Ser. No. 88/129,395 ("the '395 Mark")

80. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 80 and therefore denies the same.

81. Admitted.

82. Admitted.

83. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 83 and therefore denies the same.

84. Applicant admits that Opposer states in the referenced application that it first used JUMBONEIDA at least by Oct. 6, 1990, but is without knowledge or information sufficient to form a belief about the truth of the underlying allegation concerning the actual date of first use or date of first use in commerce referenced in Paragraph 84 and therefore denies the same.

85. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 85 and therefore denies the same.

86. Admitted except Applicant denies the allegations of Paragraph 86 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

87. Admitted except Applicant denies the allegations of Paragraph 87 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

Opposer's ONEIDA DOWNS Trademark, Ser. No. 88/129,469 ("the '469 Mark")[1]

88. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 88 and therefore denies the same.

[1] The '469 Mark, the '395 Mark, the '451 Mark, the '435 Mark, and the '417 Mark are hereinafter collectively referred to as "Opposer's Marks").

89. Admitted.

90. Admitted.

91. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 91 and therefore denies the same.

92. Applicant admits that Opposer states in the referenced application that it first used ONEIDA DOWN at least by Oct. 6, 1990, but is without knowledge or information sufficient to form a belief about the truth of the underlying allegation concerning the actual date of first use or date of first use in commerce referenced in Paragraph 92 and therefore denies the same.

93. Applicant is without knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 93 and therefore denies the same.

94. Admitted except Applicant denies the allegations of Paragraph 94 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

95. Admitted except Applicant denies the allegations of Paragraph 95 insofar as they relate to the "Entertainment services, namely, casino gaming; Gaming services in the nature of casino gaming" set forth in the referenced application.

Ostensible Grounds for Opposition to the '397 Mark – SUPER X-TRA KASH

96. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

Alleged Likelihood of Confusion

97. Applicant admits that the parties' SUPER X-TRA KASH trademarks bear a resemblance, but deny the remaining allegations of Paragraph 97 on the basis that Applicant used the '397 Mark before Opposer used the '417 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick,*

Inc. v. Fabco Equip., Inc., 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) ("The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.") (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark owner where "the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration", and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357 F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

98. Applicant admits that the parties' SUPER X-TRA KASH trademarks bear a resemblance, but deny the remaining allegations of Paragraph 98 on the basis that Applicant used the '397 Mark before Opposer used the '417 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick, Inc. v. Fabco Equip., Inc.,* 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) ("The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.") (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark owner where "the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration", and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357 F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

99. Denied.

Ostensible Lack of Bona Fide Use

100. Denied.

101. Denied.

Allegation of Applicant as Not Rightful Owner

102. Denied.

103. Denied.

Supposed Failure to Function as a Mark

104. Denied.

105. Denied.

Purported Fraud

106. Denied.

107. Denied.

108. Denied.

109. Denied.

Ostensible Grounds for Opposition to the '911 Mark – THREE SISTERS

110. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

Alleged Likelihood of Confusion

111. Applicant admits that the parties' THREE SISTERS trademarks bear a resemblance, but deny the remaining allegations of Paragraph 111 on the basis that Applicant used the '911 Mark before Opposer used the '435 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick, Inc. v. Fabco Equip., Inc.,* 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) ("The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.") (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark

owner where "the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration", and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357 F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

112. Applicant admits that the parties' THREE SISTERS trademarks bear a resemblance, but deny the remaining allegations of Paragraph 112 on the basis that Applicant used the '911 Mark before Opposer used the '435 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick, Inc. v. Fabco Equip., Inc.,* 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) ("The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.") (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark owner where "the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration", and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357 F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

113. Denied.

Ostensible Lack of Bona Fide Use

114. Denied.

115. Denied.

Allegation of Applicant as Not Rightful Owner

116. Denied.

117. Denied.

Supposed Failure to Function as a Mark

118. Denied.

119. Denied.

Purported Fraud

120. Denied.

121. Denied.

122. Denied.

123. Denied.

Ostensible Grounds for Opposition to the ’338 Mark – BINGO OR BETTER

124. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

Alleged Likelihood of Confusion

125. Applicant admits that the parties’ THREE SISTERS trademarks bear a resemblance, but deny the remaining allegations of Paragraph 125 on the basis that Applicant used the ’338 Mark before Opposer used the ’451 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick, Inc. v. Fabco Equip., Inc.,* 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) (“The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.”) (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark owner where “the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration”, and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357

F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

126. Applicant admits that the parties' THREE SISTERS trademarks bear a resemblance, but deny the remaining allegations of Paragraph 126 on the basis that Applicant used the '338 Mark before Opposer used the '451 Mark and thus the prior use defense precludes any finding of likelihood of confusion pursuant to 15 U.S.C. § 1115(b)(5). *See, e.g., Fabick, Inc. v. Fabco Equip., Inc.,* 296 F. Supp. 3d 1022, 1039 (W.D. Wis. 2017) ("The party who first appropriates a mark through use, and for whom the mark serves as a designation of source, acquires superior right to it.") (citing *Johnny Blastoff v. Los Angeles Rams Football Co.,* 188 F.3d 427, 434 (7th Cir. 1999), 15 U.S.C. § 1065 (creating an exception to right of trademark owner where "the use of a mark registered on the principal register infringes a valid right acquired under the law of any State or Territory by use of a mark or trade name continuing from a date prior to the date of registration", and *Eco Mfg. LLC v. Honeywell Int'l, Inc.*, 357 F.3d 649, 651 (7th Cir. 2003) ("Section 1065 says that even 'incontestable' marks must yield to prior users.")).

127. Denied.

Ostensible Lack of Bona Fide Use

128. Denied.

129. Denied.

Allegation of Applicant as Not Rightful Owner

130. Denied.

131. Denied.

Supposed Failure to Function as a Mark

132. Denied.

133. Denied.

Purported Fraud

134. Denied.

135. Denied.

136. Denied.

137. Denied.

Ostensible Grounds for Opposition to the ’357 Mark – JUMBO7

138. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

Ostensible Lack of Bona Fide Use

139. Denied.

140. Denied.

Allegation of Applicant as Not Rightful Owner

141. Denied.

142. Denied.

Supposed Failure to Function as a Mark

143. Denied.

144. Denied.

Purported Fraud

145. Denied.

146. Denied.

147. Denied.

Ostensible Grounds for Opposition to the '357 Mark – JUMBO7

148. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

Ostensible Lack of Bona Fide Use

149. Denied.

150. Denied.

Allegation of Applicant as Not Rightful Owner

151. Denied.

152. Denied.

Supposed Failure to Function as a Mark

153. Denied.

154. Denied.

Purported Fraud

155. Denied.

156. Denied.

157. Denied.

Affirmative Defenses

158. Applicant incorporates by reference its responses contained in the previous paragraphs of this Answer as though fully set forth herein.

159. Pursuant to Fed. R. Civ. P. 12(b)(6), the Notice of Opposition fails to state a claim upon which relief can be granted.

160. There is no likelihood of confusion, mistake, or deception between Opposer's '451 Mark for BINGO OR BETTER and Applicant's '338 Mark for BINGO OR BETTER pursuant to the prior use defense under 15 U.S.C. §1115(b)(5).

161. There is no likelihood of confusion, mistake, or deception as a matter of law between Opposer's '435 Mark for THREE SISTERS and Applicant's '911 Mark for THREE SISTERS pursuant to the prior use defense under 15 U.S.C. §1115(b)(5).

162. There is no likelihood of confusion, mistake, or deception as a matter of law between Opposer's '417 Mark for SUPER X-TRA KRASH and Applicant's '397 Mark for SUPER X-TRA KRASH pursuant to the prior use defense under 15 U.S.C. §1115(b)(5).

163. On information and belief, the Notice of Opposition is barred by the doctrine of unclean hands.

164. On information and belief, the Notice of Opposition is barred by the doctrine of laches.

165. On information and belief, the Notice of Opposition is barred by the doctrine of estoppel.

166. On information and belief, the Notice of Opposition is barred by the doctrine of acquiescence.

Prayer for Relief

WHEREFORE, Applicant, having fully answered Opposer's Notice of Opposition, respectfully prays that the Opposition be dismissed and Applicant's Marks be allowed to register.

Dated: February 8, 2019

Respectfully submitted,

Weiss and Moy, P.C.

/Kenneth M. Motolenich-Salas/

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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2019, I filed the foregoing via ESTTA with the Trademark Office Trademark Trial and Appeal Board and that a true and complete comply of the foregoing has been served on counsel for Opposer Planet Bingo, Inc. by forwarding said copy on February 8, 2019 via email to:

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/ Kenneth M. Motolenich-Salas /

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