

ESTTA Tracking number: **ESTTA996113**

Filing date: **08/20/2019**

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

Proceeding	91249586
Party	Defendant Velikin, Peter; Alexandrov, Kiril
Correspondence Address	ROBERT M. WARD BMWIPALAW.COM 621 BRIXTON CIRCLE SIMPSONVILLE, SC 29681 rward@bmiplaw.com, bmwlaw@aol.com no phone number provided
Submission	Answer
Filer's Name	robert m. ward
Filer's email	rward@bmiplaw.com, bmwlaw@aol.com
Signature	/robert m. ward/
Date	08/20/2019
Attachments	APPLICANTS ANSWER TO OPPOSERS NOTICE OF OPPOSITION.pdf(101608 bytes )

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

In the matter of Trademark  
Application Serial No: 8793373  
Filing date: May 23, 2018  
Mark: BONOBO  
Published for Opposition: May 29, 2019

Bonobos, Inc.,

Opposer,

v.

Opposition No. 91249586

Peter Velikin and Kiril Alexandrov,

Applicants.

---

**APPLICANTS' ANSWER TO OPPOSER'S NOTICE OF OPPOSITION**

Now come the above identified Applicants and respond to the Opposer's Notice of Opposition, and admitting only so much as is expressly admitted herein, answer as follows:

1. The Applicants do not have information sufficient to admit or deny the allegations related to Opposer's alleged activities, and accordingly deny the same. Otherwise denied.
  
2. The Applicants do not have information sufficient to admit or deny the allegations related to Opposer's alleged activities, and accordingly deny the same. Otherwise denied.

3. The Applicants do not have information sufficient to admit or deny the allegations related to Opposer's alleged activities, and accordingly deny the same. Otherwise denied.
4. The Applicants do not have information sufficient to admit or deny the allegations related to Opposer's alleged activities, and accordingly deny the same. Otherwise denied.
5. Admitted as to Applicants' address.
6. Admitted as to Applicants' filed application.
7. Admitted as to the listing of goods in Applicants' filed application.
8. The Applicants do not have information sufficient to admit or deny the allegations related to Opposer's alleged activities or alleged rights, and accordingly deny the same. Otherwise denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.

### **AFFIRMATIVE DEFENSES**

1. The notice of opposition fails to state a cause of action for which relief could be granted.
2. There is no likelihood of confusion, mistake or deception.

3. The Notice of Opposition is barred by the doctrines of acquiescence, waiver, consent, laches or estoppel.
4. The Applicants respectfully reserve their rights to raise additional affirmative and/or other defenses that may be warranted by evidence disclosed during the course of discovery.

WHEREFORE, Applicants respectfully request that the Opposer's Notice of Opposition be dismissed with prejudice, and that the Applicants' application proceed to issuance as a registration.

Respectfully submitted this 20th day of August, 2019,

**Robert M. Ward**

Robert M. Ward  
USPTO Reg. No. 26,517  
BMWipLAW, LLC  
3455 Peachtree Road NE,  
Floor 5  
Atlanta, GA 30326  
Ph: 404-606-6480

*Attorney for Applicants*

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing was filed on the date set forth hereon electronically via the ESTTA electronic filing system in the United States Patent and Trademark Office with notice and copy of same being electronically served by the TTAB upon all counsel of record.

**Robert M. Ward**