

ESTTA Tracking number: **ESTTA1009255**

Filing date: **10/16/2019**

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

Proceeding	91250367
Party	Defendant Gere Enterprises LLC DBA campersAPP
Correspondence Address	BEN T LILA MANDOUR & ASSOCIATES APC 8605 SANTA MONICA BLVD, SUITE 1500 LOS ANGELES, CA 90069 UNITED STATES blila@mandourlaw.com, jmandour@mandourlaw.com 858-487-9300
Submission	Motion to Amend/Amended Answer or Counterclaim
Filer's Name	Ben T. Lila
Filer's email	blila@mandourlaw.com, jmandour@mandourlaw.com
Signature	/Ben T. Lila/
Date	10/16/2019
Attachments	Amended Answer to Hotel Tonight 10-16-19.pdf(94759 bytes )

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

In the Matter of Application Serial No. 88/182,488,  
for the mark SITE TONITE.  
Published in the Official Gazette on April 23, 2019.

Hotel Tonight, LLC,	)	
	)	
Opposer,	)	Opposition No. 91250367
	)	
v.	)	
	)	
Gere Enterprises LLC DBA campersAPP,	)	
	)	
Applicant.	)	
	)	

**APPLICANT GERE ENTERPRISES LLC DBA CAMPERSAPP’S AMENDED ANSWER  
TO HOTEL TONIGHT, LLC’S NOTICE OF OPPOSITION**

Applicant Gere Enterprises LLC DBA campersAPP hereby answers Opposer Hotel Tonight, LLC’s Notice of Opposition as follows:

1. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 1 of the Notice of Opposition and on that basis denies said allegations.
2. Admit.
3. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 3 of the Notice of Opposition and on that basis denies said allegations.
4. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 4 of the Notice of Opposition and on that basis denies said allegations.

5. Applicant admits U.S. Trademark Reg Nos. 4,200,119 and 5,684,741 speak for themselves. Applicant admits Exhibit A is attached to the Notice of Opposition.

6. Applicant admits U.S. Trademark Reg Nos. 4,200,119 and 5,684,741 speak for themselves.

7. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 7 of the Notice of Opposition and on that basis denies said allegations.

8. Denied.

9. Denied.

10. Denied.

11. Applicant denies it requires any permission from Opposer.

12. Applicant admits U.S. Trademark Serial No. 88/182,488 speaks for itself.

13. Applicant admits U.S. Trademark Serial No. 88/182,488 speaks for itself.

14. Applicant admits U.S. Trademark Serial No. 88/182,488 speaks for itself.

15. Applicant admits U.S. Trademark Serial No. 88/182,488 speaks for itself.

16. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 16 of the Notice of Opposition and on that basis denies said allegations.

17. Applicant is unaware of sufficient information as to respond to the truth or falsity of the allegations contained in Paragraph 17 of the Notice of Opposition and on that basis denies said allegations.

18. Applicant realleges and incorporates by reference the preceding allegations in this Answer.

19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.

WHEREFORE, Applicant respectfully requests that:

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

Respectfully submitted,

Date: October 16, 2019

/Ben T. Lila/

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Attorneys for Applicant,  
Gere Enterprises LLC DBA campersAPP

**CERTIFICATE OF SERVICE**

I hereby certify that on the below date a copy of the foregoing:

**APPLICANT GERE ENTERPRISES LLC DBA CAMPERSAPP'S AMENDED  
ANSWER TO HOTEL TONIGHT, LLC'S NOTICE OF OPPOSITION**

has been served via email on the following:

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Date: October 16, 2019

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