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

Proceeding	91251473
Party	Defendant Cumhuriyet Meats
Correspondence Address	CUMHURIYET MEATS 18 COMMERCE RD, SUITE D FAIRFIELD, NJ 07004 info@nemahalal.com no phone number provided
Submission	Answer
Filer's Name	Galip Kiyakli
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Date	11/15/2019
Attachments	Applicants Answer to Opposers Claims 11 15 2019.pdf(288812 bytes)

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

In the Matter of Registration Serial No: 88284023

For the mark: Cumhuriyet

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**AFYON ET VE ET MAMULLERI SANAYI VE TICARET
LIMITED SIRKETI** **Opposer,**

Opposition No: 91251473

CUMHURIYET MEATS **Applicant.**

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ANSWER

Applicant Cumhuriyet Meats (“Applicant”), hereby Answers the Opposition filed by AFYON ET VE ET MAMULLERI SANAYI VE TICARET LIMITED SIRKETI (“Opposer”) to the registration for its trademark Cumhuriyet, subject of Trademark Registration Serial No: 88284023 as follows:

AS TO OPPOSER'S STATEMENTS

1. Admitted.
2. Applicant registered, Cumhuriyet Meats as an Alternate Name of a NJ corporation On November 27th, 2018 which was before the trademark application date. A copy of Certificate of Alternate Name from New Jersey Department of Treasury was submitted as a specimen when filing for trademark registration. Therefore, Applicant denies this claim.
3. Cumhuriyet Meats is a registered Alternate Name for a NJ corporation. Therefore, Applicant denies this claim.
4. Cumhuriyet Meats is a registered Alternate Name for a NJ corporation. Therefore, Applicant denies this claim.
5. Meat products from Turkey is not allowed to enter to US. Therefore, Applicant denies this claim.
6. Applicant only filed to register "Cumhuriyet", not "Cumhuriyet Sucuklari". In addition, distribution of meat products from Turkey to U.S.A. and other countries are restricted. Therefore, Applicant denies this claim.
7. Applicant filed for the trademark registration of Cumhuriyet exclusively for marketing this brand in US geographical region. Opposer filed for registration of Cumhuriyet Sucuklari on August 20, 2019, 8 months after Applicant's filing. As of their filing date, Opposer don't have any known production and marketing using this brand in the US. In addition, opposer only have production facility in Turkey and any kind of meat product from Turkey forbidden to enter to US. Therefore, Applicant denies this claim.
8. Applicant did not file for any design registration. Applicant filed only to register the word mark "Cumhuriyet". Therefore, Applicant denies this claim.
9. Applicant has no intentions to market Cumhuriyet brand in Turkey. Applicant has been

selling products with this brand in the US only. As mentioned, it is illegal for meat products to enter US. For this reason, Opposer cannot export any of their products to US. Therefore, Applicant denies this claim.

10. Admitted.

11. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 11, therefore, Applicant denies these averments.

12. Admitted.

13. Admitted.

14. Admitted. Both Mr. Kiyakli and Mr. Nakiboglu are Turkish-Americans.

15. Mr. Kiyakli and/or Mr. Nakiboglu did not travel to Turkey since 2015. Therefore, Applicant denies this claim.

16. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 16, therefore, Applicant denies these averments.

17. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 17, therefore, Applicant denies these averments.

18. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 18, therefore, Applicant denies these averments.

19. Opposer, as of Applicant's original filing date, did not have any distribution of these products nor could export from Turkey to US. Therefore, Applicant denies this claim.

20. Applicant applied only for a word mark for Cumhuriyet. Therefore, Applicant denies this claim.

21. Applicant has not been seeking to register any color or design. Therefore, Applicant denies this claim.

22. Applicant markets its products to all Halal Meat consumers in the US regardless of the nationality. Turkish origin Halal Customers are minority in the US Halal Meat Market.

Therefore, Applicant denies this claim.

23. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 23, therefore, Applicant denies these averments.

24. It is clearly stated on the Applicant's product packages that the products are Made in the USA. Therefore, Applicant denies this claim.

25. Opposer does not have any marketing efforts of its brand in the US. Furthermore, exporting meat products from Turkey to the US is forbidden. Therefore, Applicant denies this claim.

26. Applicant is without knowledge or information enough to form a belief as to the truth of the averments raised in paragraph 26, therefore, Applicant denies these averments.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

Respectfully submitted,

Galip Kiyakli

COO for Cumhuriyet Meats

Dated: November 15, 2019

By:  _____

Galip Kiyakli, COO

Cumhuriyet Meats

18 Commerce Rd Suite D

Fairfield NJ, 07004

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served on MATTHEW D ASBELL of LADAS & PARRY LLP by forwarding said copy on November 15, 2019, via email to: masbell@ladas.com, jzwisler@ladas.com, mkirkorian@ladas.com, tjones@ladas.com, jbondell@ladas.com.

Signature 

Date: November 15, 2019