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

Proceeding	91252274
Party	Defendant Allies Group Pte. Ltd.
Correspondence Address	JON A. SCHIFFRIN SCHIFFRIN & LONGO, P.C. 8200 GREENSBORO DR STE 900 MC LEAN, VA 22102 jon@schifftrinlaw.com no phone number provided
Submission	Answer
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Date	11/14/2019
Attachments	it gets better answer.pdf(506780 bytes)

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

Savage Love, LLC.,	§	
	§	
Opposer,	§	
	§	Opposition No. 91/252,274
v.	§	
	§	
Allies Group Pte. Ltd.,	§	
	§	
Applicant.	§	

ANSWER TO
SAVAGE LOVE, LLC’S NOTICE OF OPPOSITION

Applicant, Allies Group Pte. Ltd. (“Applicant”), by and through its undersigned counsel, hereby files its Answer to Opposer Savage Love LLC’s (“Opposer”) Notice of Opposition, as follows:

1. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.
2. With regard to the allegations in paragraph 2 that characterize the copies of U.S. Trademark Registration Nos. 3,970,026, 4,303,480, and 4,265,049, Applicant refers the Board to those documents for their contents. Applicant lacks knowledge or information sufficient to form a belief about Opposer’s ownership claims; therefore, same are denied.
3. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.
4. No response is required.
5. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

6. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

7. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

8. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

9. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

10. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

11. Admit.

12. Admit.

13. Admit.

14. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

15. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

16. Admit that the mark is identical to IT GETS BETTER and that Opposer has not authorized Applicant's use or registration of Applicant's Mark. Applicant denies the remaining allegations set forth in this paragraph.

17. Denied.

18. Denied.

19. Denied.
20. Denied.
21. Denied.
22. Applicant lacks knowledge or information sufficient to form a belief about the truth of these allegations; therefore, same are denied.

AFFIRMATIVE DEFENSE

1. Applicant limits its identification of goods and services from:

Anti-wrinkle cream; Beauty masks; Cosmetic preparations for skin care; Cosmetic soaps; Cosmetic tanning preparations; Cosmetics; Cuticle removing preparations; Hair cleaning preparations; Moisturizing creams; Skin whitening creams; Skin whitening preparations; Wrinkle-minimizing cosmetic preparations for topical facial use; Age spot reducing creams; Cosmetic masks; Cosmetic preparations for skin renewal; Cosmetic preparations for slimming purposes; Facial masks; Facial moisturizers; Non-medicated bath preparations; Non-medicated lip care preparations; Non-medicated skin toners; Skin moisturizer, in Class 3

~~Advertising services; Business management; Mail order services featuring cosmetic and beauty care products; Marketing services; On-line retail store services featuring cosmetic and beauty care products; On-line wholesale store services featuring cosmetic and beauty care products; Retail store services featuring cosmetic and beauty care products; Sales promotion services; Wholesale store services featuring cosmetic and beauty care products; Mail order catalog services featuring cosmetic and beauty care products; Providing incentive award programs for customers through issuance and processing of loyalty points for on-line purchase of a company's goods and services,~~ in Class 35;
to:

Anti-wrinkle cream; Beauty masks; Cosmetic preparations for skin care; Cosmetic soaps; Cosmetic tanning preparations; Cosmetics; Cuticle removing preparations; Hair cleaning preparations; Moisturizing creams; Skin whitening creams; Skin whitening preparations; Wrinkle-minimizing cosmetic preparations for topical facial use; Age spot reducing creams; Cosmetic masks; Cosmetic preparations for skin

renewal; Cosmetic preparations for slimming purposes; Facial masks; Facial moisturizers; Non-medicated bath preparations; Non-medicated lip care preparations; Non-medicated skin toners; Skin moisturizer, in Class 3;

Mail order services featuring cosmetic and beauty care products; On-line retail store services featuring cosmetic and beauty care products; On-line wholesale store services featuring cosmetic and beauty care products; Retail store services featuring cosmetic and beauty care products; Wholesale store services featuring cosmetic and beauty care products; Mail order catalog services featuring cosmetic and beauty care products, in Class 35.

Respectfully Submitted,

/jonaschiffrin/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Answer to Opposer's Notice of Opposition has been served via U.S. First Class mail upon the following counsel of record this 14th_ day of November, 2019.

Marlene J. Williams, Esq.
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Jon A. Schiffrin