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Filing date: **12/18/2019**

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

Proceeding	91252846
Party	Defendant Bumble Bee Foods, LLC
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 8584879300
Submission	Answer
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Signature	/Ben T. Lila/
Date	12/18/2019
Attachments	Answer FRC Balance 12-18-19.pdf(93995 bytes)

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

In the matter of Trademark Serial No. 88/444,317,
for the trademark TRUE WATER FOODS.
Published in the *Official Gazette* on August 13, 2019.

FRC Balance LLC,)	
)	
Opposer,)	Cancellation No. 91252846
)	
v.)	
)	
Bumble Bee Foods, LLC,)	
)	
Applicant.)	
_____)	

APPLICANT BUMBLE BEE FOODS, LLC'S ANSWER

Applicant Bumble Bee Foods, LLC hereby answers the Notice of Opposition of FRC Balance LLC as follows:

1. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 1 of the Notice of the Opposition and on that basis denies said allegations.
2. Admit.
3. Applicant admits Trademark Reg. Nos. 3,620,741, 4,049,211 and 3,688,743 speak for themselves and that true and correct copies of the registrations are attached to the Notice of Opposition as Exhibit 1.
4. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 4 of the Notice of the Opposition and on that basis denies said allegations.

5. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 5 of the Notice of the Opposition and on that basis denies said allegations.

6. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 6 of the Notice of the Opposition and on that basis denies said allegations.

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

8. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 8 of the Notice of the Opposition and on that basis denies said allegations.

9. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 9 of the Notice of the Opposition and on that basis denies said allegations.

10. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 10 of the Notice of the Opposition and on that basis denies said allegations.

11. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 11 of the Notice of the Opposition and on that basis denies said allegations.

12. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 12 of the Notice of the Opposition and on that basis denies said allegations.

13. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 13 of the Notice of the Opposition and on that basis denies said allegations.

14. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 14 of the Notice of the Opposition and on that basis denies said allegations.

15. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 15 of the Notice of the Opposition and on that basis denies said allegations.

16. Admit.

17. Admit.

18. Admit.

19. Applicant admits it provides seafood to the general public, which may include restaurants.

20. Applicant admits its website speaks for itself and is attached to the Notice of Opposition.

21. Applicant admits its website speaks for itself and is attached to the Notice of Opposition.

22. Applicant is unaware of information sufficient to respond as to the truth or falsity of the allegations of Paragraph 22 of the Notice of the Opposition and on that basis denies said allegations.

23. Denied.

24. Denied.

25. Denied.

26. Denied.
27. Denied.
28. Denied.
29. Denied.
30. Denied.
31. Denied.
32. Denied.
33. Denied.
34. 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.

Dated: December 18, 2019

Respectfully Submitted,

/Ben T. Lila/

Ben T. Lila
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Attorneys for Applicant,
BUMBLE BEE FOODS, LLC

CERTIFICATE OF SERVICE

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

APPLICANT BUMBLE BEE FOODS, LLC'S ANSWER

has been served via email upon the following:

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Dated: December 18, 2019

/Ben T. Lila/

Ben T. Lila