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Filing date: **02/19/2020**

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

Proceeding	91253413
Party	Defendant Zhang Peng
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Submission	Answer
Filer's Name	Jonathan G. Morton
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Signature	/Jonathan G. Morton/
Date	02/19/2020
Attachments	Answer TUVROR.pdf(191531 bytes)

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

TUDOR WATCH U.S.A., LLC.,

Opposer,

v.

ZHANG PENG,

Applicant.

Opposition No. 91253413

Serial No. 88542229

Mark: TUVROR

Filing Date: July 27, 2019

Publication Date: November 19, 2019

APPLICANT'S ANSWER TO THE NOTICE OF OPPOSITION

Zhang Peng, (“Applicant”) a Chinese individual with an address of Po Hing era B2-1917, Dafapu bantian, Shenzhen, China 518129, by and through its counsel of record, Jonathan G. Morton, answers Tudor Watch U.S.A., LLC’s (“Opposer”) Notice of Opposition as follows:

1. Answering Paragraph 1 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
2. Answering Paragraph 2 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
3. Answering Paragraph 3 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
4. Answering Paragraph 4 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and

accordingly denies the same, except Applicant admits the existence of U.S.

Registration No.'s: 0661372; 5045861; 1002030; and 5045862.

5. Answering Paragraph 5 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
6. Answering Paragraph 6 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
7. Answering Paragraph 7 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
8. Answering Paragraph 8 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
9. Answering Paragraph 9 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
10. Answering Paragraph 10 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
11. Answering Paragraph 11 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
12. Answering Paragraph 12 of the Notice of Opposition, Applicant admits the allegations

contained therein.

13. Answering Paragraph 13 of the Notice of Opposition, Applicant admits the allegations contained therein.

14. Answering Paragraph 14 of the Notice of Opposition, Applicant denies the allegations contained therein.

15. Answering Paragraph 15 of the Notice of Opposition, Applicant admits the allegations contained therein.

16. Answering Paragraph 16 of the Notice of Opposition, Applicant denies the allegations contained therein.

17. Answering Paragraph 17 of the Notice of Opposition, Applicant denies the allegations contained therein.

18. Answering Paragraph 18 of the Notice of Opposition, Applicant denies the allegations contained therein.

19. Answering Paragraph 19 of the Notice of Opposition, Applicant denies the allegations contained therein.

20. Answering Paragraph 20 of the Notice of Opposition, Applicant admits that it seeks to use the TUVROR mark on “smart watches” and Applicant does not have sufficient knowledge or information to form a belief as to the remaining allegations contained therein and accordingly denies the same.

21. Answering Paragraph 21 of the Notice of Opposition, Applicant denies the allegations contained therein.

22. Answering Paragraph 22 of the Notice of Opposition, Applicant denies the allegations contained therein.

23. Answering Paragraph 23 of the Notice of Opposition, Applicant denies the allegations

contained therein.

24. Answering Paragraph 24 of the Notice of Opposition, Applicant denies the allegations contained therein.

25. Answering Paragraph 25 of the Notice of Opposition, Applicant denies the allegations contained therein.

26. Answering Paragraph 26 of the Notice of Opposition, Applicant denies the allegations contained therein.

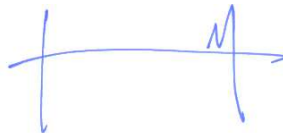
27. Answering Paragraph 27 of the Notice of Opposition, Applicant denies the allegations contained therein.

AFFIRMATIVE DEFENSES

Applicant reserves the right to rely on such other and further defenses as may be supported by facts to be determined through comprehensive discovery and to amend its Answer accordingly to assert such defenses.

WHEREFORE, Applicant respectfully requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition, dated January 9, 2020, with prejudice and permit Application Serial No. 88542229 to proceed to registration.

Dated: February 19, 2020



By: _____
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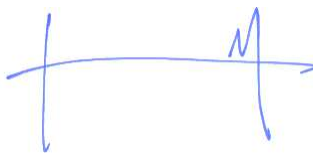
CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing ANSWER TO THE NOTICE OF OPPOSITION, dated February 19, 2020, has been served on Opposer's Attorney of Record by e-mail at the following addresses:

Adam Sgro, Esq.:

asgro@gibney.com
bfrenchman@gibney.com
vtoranzo@gibney.com
bwbrokate@gibney.com
pcousins@gibney.com

Dated: February 19, 2020

A handwritten signature in blue ink, consisting of a stylized 'J' and 'M' connected by a horizontal line.

By:
Jonathan G. Morton, Esq.