

ESTTA Tracking number: **ESTTA1074738**

Filing date: **08/13/2020**

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

Proceeding	91256718
Party	Defendant Dtize Studios Inc
Correspondence Address	DTIZE STUDIOS INC 9475 DOUBLE R BLVD STE 23 RENO, NV 89521 UNITED STATES Primary Email: info@rornapparel.com Secondary Email(s): ipo@myipstrategy.com 775-287-5373
Submission	Other Motions/Papers
Filer's Name	Ashley Parr
Filer's email	info@rornapparel.com
Signature	/Ashley Parr/
Date	08/13/2020
Attachments	Applicant Answer-RORN-Logo-88551172.pdf(3815336 bytes)

Applicant Answer

Serial #: 88551172

Mark: **RORN**

Name: Dtize Studios Inc

Correspondence: DTIZE STUDIOS INC

DTIZE STUDIOS INC

9475 DOUBLE R BLVD, STE 23

RENO, NV 89521

info@rornapparel.com

Applicant, a Nevada Corporation, believes the mark is a completely different word and design mark and does not damage the opposer's business.

1. The word **BORN** meaning: past participle of bear¹ (sense 4). – adjective: existing as a result of birth. The definition of **RORN** is made up and still undefined. The closes definition is in Urban Dictionary (www.urbandictionary.com) › define › term = Rorn is simply “the sound when a hostile human defends its food, territory etc . The Man was

angry so he Rorned the enemy away.” This is clearly a difference in meaning just as much as other four letter words similar to BORN for example: **TORN** (which comes up more often when searching RORN), **WORN, HORN, LORN, CORN, SORN**. All having different meaning than BORN but end in “ORN.” (See Exhibit A)

2. The comparison of the Applicant’s mark and the Opposer’s mark are differently designed mark that doesn’t cause confuse. The Opposer’s design is a crown and the Applicant’s design is an abstract “R” looking like a star shape. With the focus around the R. (See Exhibit B)
3. Opposer’s (**BORN**) product brand is footwear (Reference Opposer’s documents “IC/Goods 025: footwear). Searching the opposer’s product shows up as casual sandals (<https://www.bornshoes.com/>). Further researching “BORN clothes” shows up as baby clothes of many other companies. Searching “BORN Logo Apparel” also show up as many other companies using the word born in their logo which have a much more like hood to cause confusion compared to the word RORN. (See Exhibit C)
4. Applicant’s (**RORN**) mark is athletic wear (<https://projectrorn.com/>). When researching “RORN clothes” it shows up as torn clothing. (See Exhibit D)

Applicant believes there is a prominent amount of evidence showing no confusion in the brand marks and should continue with the registration of trademark with no changes. Applicant is also willing to delete **FOOTWEAR** if needed to separate the Opposer’s and Applicant’s marks even more, so that both companies can continue with their marks moving forward.

I hereby certify that a true and complete copy of the foregoing RORN trademark has been served on
Columbia Insurance Company by:

Respectfully,

DTIZE STUDIOS INC

Ashley Parr

9475 DOUBLE R BLVD STE 23

RENO, NV 89521

UNITED STATES

info@rornapparel.com

Phone: 775-287-5373

Opposition No. 91256718

Forwarding said copy via email dchen@ipattorneysgroup.com to:

DAVID CHEN

IP ATTORNEYS GROUP,LLC

16 OXFORD ROAD

MILFORD, CT 06460

UNITED STATES

Phone: 203-298-4830.

A handwritten signature in black ink, appearing to read "Ashley Parr". The signature is fluid and cursive, with the first name "Ashley" written in a larger, more prominent script than the last name "Parr".

Signature_____Date____07/31/2020_____

Exhibit A



define born



[All](#) [News](#) [Shopping](#) [Images](#) [Videos](#) [More](#) [Settings](#) [Tools](#)

About 714,000,000 results (0.61 seconds)

Dictionary

Search for a word



born

/bɔrn/

past participle of **bear**¹ (sense 4).

adjective

existing as a result of birth.
"he was born in Seattle"



Translations, word origin, and more definitions

Definitions from Oxford Languages

[Feedback](#)



define born



[Feedback](#)

[www.merriam-webster.com](#) › dictionary › born ▾

Born | Definition of Born by Merriam-Webster

English Language Learners **Definition** of **born** : brought into life by the process of birth. : having certain qualities or characteristics from the time of birth. —used to describe the place where someone was **born** —often used in combination. See the full **definition** for **born** in the English Language Learners Dictionary.

[Born/natural Leader](#) · [Born Out Of](#) · [Born Of Necessity](#) · [Born And Bred](#)

[dictionary.cambridge.org](#) › dictionary › english › born ▾

BORN | definition in the Cambridge English Dictionary

Meaning of **born** in English. **born**.

[www.dictionary.com](#) › browse › born ▾

Born | Definition of Born at Dictionary.com

Born definition, brought forth by birth. See more. ... verb (used with object), bore or (Archaic) bare; borne or **born**; bear-ing. to hold up; support: to bear the weight ...

[www.macmillandictionary.com](#) › dictionary › american ▾

BORN (adjective) definition and synonyms | Macmillan ...

born Definitions and Synonyms . adjective. UK /bɔː(r)n/ ...



define rorn



All

Images

News

Videos

Shopping

More

Settings

Tools

About 469,000 results (0.45 seconds)

Did you mean: [define torn](#)

Rorn was a gigantic humanoid with cooling lava-like skin and the head and tail of a dragon, capable of transforming into a blazing star of light brighter than the sun.

[forgottenrealms.fandom.com](#) › wiki › Rorn

[Rorn | Forgotten Realms Wiki | Fandom](#)

About Featured Snippets Feedback

[www.urbandictionary.com](#) › define › term=Rorn

[Rorn - Urban Dictionary](#)

Rorn is simply the sound when a hostile human defends its food, territory etc .

[www.wordnik.com](#) › words › Rorn

[Rorn - definition and meaning - Wordnik](#)

Sorry, no definitions found. You may find more data at [rorn](#). ... Support. Help support Wordnik (and make this page ad-free) by adopting the word **Rorn** here.

Exhibit B

Børn®



R O R N™

Exhibit C

TAKE COMFORT IN STYLE

Starting at \$79

SHOP MEADE



WOMEN'S

MEN'S

shop all

sandals

casual

tailored

sneaker

clogs

boots

on sale

accessories



WHIGHAM
\$100.00



WHITMAN
\$96.00 - \$97.00



BROMPTON
\$90.00



ALLEGHENY
\$86.00 - \$95.00



ALEKSANDER
\$69.00 - \$90.00



shop all
sandals
casual
flats
heels
sneaker
clogs
boots
on sale
accessories

MEN'S



AGUA
\$50.00 - \$54.00



AMELIE
\$63.00 - \$68.00



MEADE
\$79.00 - \$87.00



INTI
\$85.00



KIVALINA
\$77.00 - \$80.00



newborn baby water birth maternity hospital just born newborn baby boy hospital delivery work woollen knit handmade pretty baby



ebuddy 6 Sets Doll Clothes Outfit...
amazon.com



Reborn Baby Dolls Cotton Cloth...
aliexpress.com · In stock



Amazon.com: ebuddy 7 Pcs Do...
amazon.com



Newborn Baby Infant Boy Clothes ...
m.dhgate.com



Cartoon Newborn Clothes Baby...
aliexpress.com · In stock



2020 Baby Rompers Short Slee...
m.dhgate.com



18 inch 40 43cm Doll Baby Bo...
aliexpress.com · In stock



Baby Boys Clothes Set New De...
ebay.com · In stock



new born baby girl clothes dress...
johnkart.com · In stock



Yq85 Summer Cheap China Im...
alibaba.com



Born Baby Gift Set Clothes Sof...
alibaba.com



2020 2019 New Born Baby Boy G...
m.dhgate.com



Baby Girl Clothes Spring Newbor...
aliexpress.com · In stock



New-born Infant Baby Girl Clo...
ebay.com · In stock





Born Logo apparel



Q All Shopping Images News Videos More Settings Tools

Collections SafeSea

nevada rose jewel corvette typography poster birthday girl battle born palm tree shirt ladies tee typography graphic win born free safety



T-Shirt - Ladies V Neck Bat...
shop.leg.state.nv.us



Battle Born Logo - Long Sle...
shop.leg.state.nv.us



Born Free Tee - Oscar Mike...
oscarmike.org - In stock



Born Dead Clothing - Home...
facebook.com



T-Shirt - Ladies V Neck Bat...
shop.leg.state.nv.us



Born to rock t-shirt and a...
vectorstock.com



Born Free Tee - Oscar Mike...
oscarmike.org - In stock



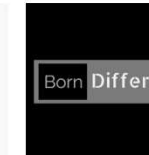
Born Surf Tshirt App
shutterstock.com



Young Versace Rose Jew...
versace.com - Out of stock



Born to ride Apparel t-shirt...
amazon.com



Born Different Apparel - Home...
facebook.com



Young Versace Safety Pi...
versace.com



EventFlags - Flags, Banners a...
eventflags.com



Born to surf. T-shirt and appare...
colourbox.com



California surfing. T-shirt and apparel...
pinterest.com



Born to surf. T-shirt and apparel...
pinterest.com



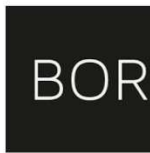
Born Logo Clothing



Q All Shopping Images News Videos More Settings Tools

Collections SafeSearch

rose jewel carhartt workwear born fly galway 90s vintage design j cole born dead born sinner logo design brand safety pin unisex clothing



Born Clothing | Athlone Towncentre...
athlonetowncentre.com



Born - Home | Facebook
facebook.com



Born King Clothing | Atlanta | Home
bornkingclothing.com



Born Dead Clothing - Home...
facebook.com



Born Rich Clothing - Home...
facebook.com



Womens from Born Ma...
amazon.com



BORN FLY CLOTHING | Log...
pinterest.com



Born Dead Clothing - Villa...
villanarts.com



Born Scum Clothing - Hom...
facebook.com



fish logo - Fishing - T-Shir...
teepublic.com - In stock



Born Fly
filthydripped.com



Young Versace Barocc...
versace.com - Out of stock



Young Versace Rose J...
versace.com - Out of stock



Born Clothing | Parkway Shopping...
parkwaysc.com





Born Logo sandals



Q All Shopping Images News Videos More Settings Tools

Collections SafeSearch

toe sandals

sandals flats

iwa

leather ankle

ankle strap

versace

dillard

leather sandals

slide sandals

shoes

wedge sandals

brown leather

born



Born Shoes | Leather Sandals | ...
poshmark.com - In stock



Born Shoes, Boots, Sandals & Flats ...
zappos.com



Ankle Strap Cruiser Comfort Sa...
poshmark.com - In stock



Young Versace Logo San...
versace.com - Out of stock



Casual Slide Mule Sandals Shoes ...
ebay.com - In stock



Born Tan Soft Leather Covered Toe Strap ...
tradeasy.com - In stock



Sz 9 Womens Brown Le...
ebay.com



Born Carys Fisherman Sandals - Women's ...
rei.com



Orange Slide Sandals O...
poshmark.com - Out of st...



Born Iwa Sandals - Women's | REI Co...
rei.com



Born Bernt Leather We...
dillards.com - In stock



About Born - The Official Born Shoes ...
bornshoes.com



Heeled Sandals | Sand...
pinterest.at

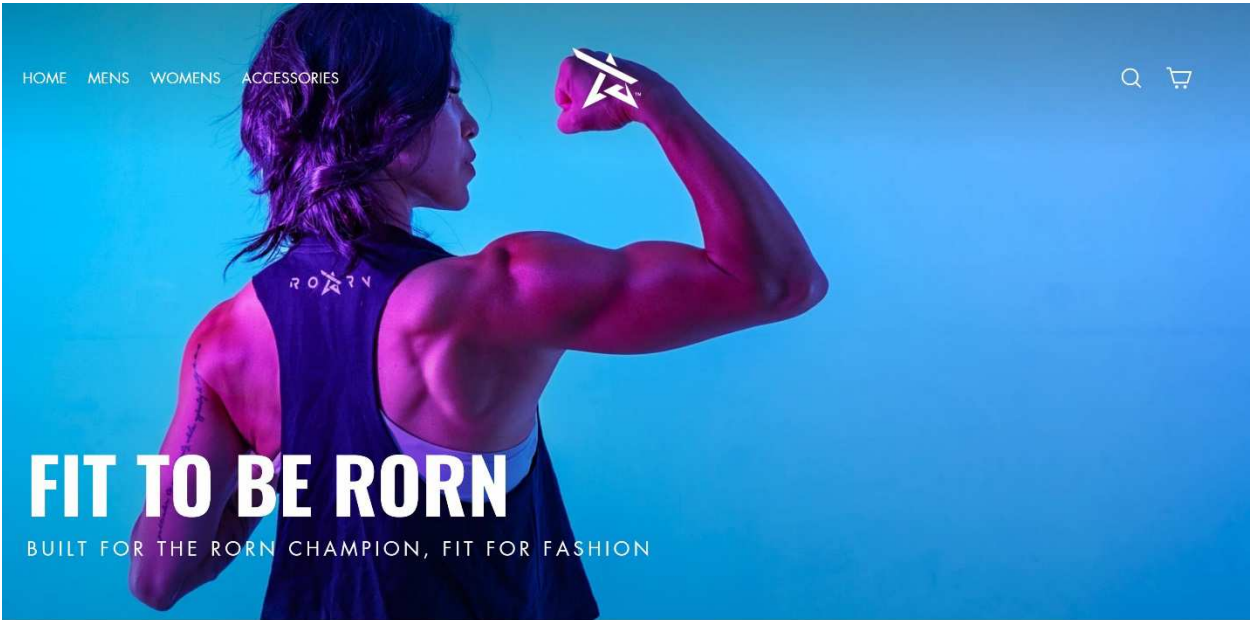


Exhibit D



Sort 

Workout Clothing Designed for Performance Workouts. Compliment the Hard Work and Dedication to Training.



Sort ▾

Workout Clothing Designed for Performance Workouts. Compliment the Hard Work and Dedication to Training.



FIT TO BE RORN
\$30.00



SILVER RORN
\$28.00



ICE BLUE RORN
\$28.00



OXBLOOD
\$28.00



Sort ▾

Workout Clothing Designed for Performance Workouts. Compliment the Hard Work and Dedication to Training.



FIT TO BE RORN – BLACK
HOODIE
\$48.00



BLACK RACERBACK RORN
\$33.00



FIT TO BE RORN – HOODIE
\$48.00



RORN WRISTBAND
\$7.95



rom clothes



Q All Images Shopping Videos News More Settings Tools

Collections SafeSearch



Showing results for **torn** clothes
Search instead for **rom** clothes



Why Do Rich People Wear Tor...
medium.com



dForce Torn Clothes For ...
daz3d.com



Dutch rail uses ripped clothes ...
straitstimes.com



torn clothes - Google S...
pinterest.co.uk



Washer Tangled or Torn ...
superpages.com



Saudis urge ban on 'torn' clot...
emirates247.com



dForce Torn Clothes fo...
daz3d.com



dForce Torn Clothes for Genesis 8 Fe...
posercontent.com



dForce #Torn #Clothes...
pinterest.com



dForce Torn Clothes fo...
posercontent.com



Distressed Fashion: Th...
cngpt.com



Marvelous Designer 5 Tutori...
artstation.com



Why Do Rich People Wear Torn Clothes ...
medium.com



Fabric Could Be the End to Torn Clothes
newsweek.com

