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

Proceeding	91264500
Party	Defendant Microsoft Corporation
Correspondence Address	APRIL L BESL DINSMORE & SHOHL LLP 255 EAST FIFTH STREET SUITE 1900 CINCINNATI, OH 45202 UNITED STATES Primary Email: april.besl@dinsmore.com Secondary Email(s): DSMSTrademarks@dinsmore.com, jaci.overmann@dinsmore.com, leanthony.edwards@dinsmore.com, luke.curran@dinsmore.com 513-977-8527
Submission	Answer
Filer's Name	Luke S. Curran
Filer's email	april.besl@dinsmore.com, DSMSTrademarks@dinsmore.com, jaci.overmann@dinsmore.com, leanthony.edwards@dinsmore.com, luke.curran@dinsmore.com
Signature	/Luke S Curran/
Date	04/16/2021
Attachments	Answer to Notice of Opposition 91264500 - POWER YOUR DREAMS - CL. 25. pdf(168613 bytes )

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

HONDA MOTOR CO., LTD.,	)	
Opposer,	)	Opposition No.: 91264500
	)	
-vs-	)	Application No.: 88/743,535
	)	
MICROSOFT CORPORATION,	)	Mark: POWER YOUR DREAMS
Applicant.	)	
	)	

**ANSWER TO NOTICE OF OPPOSITION**

Applicant, Microsoft Corporation (“Microsoft”), a Washington Corporation with its principal place of business at One Microsoft Way Redmond, Washington 98052, owns U.S. Trademark Application Serial No. 88/743,535 (the “Application”). Applicant denies the averment in the first introductory paragraph of the Notice of Opposition that the registration of Applicant’s trademark POWER YOUR DREAMS will damage Opposer, Honda Motor Co., Ltd. (“Opposer”).

Applicant denies each and every allegation contained in Opposer’s Notice of Opposition unless otherwise admitted or responded to as follows:

1. Applicant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 1 and therefore denies the same.
  
2. Applicant admits that according to the publicly available records of the U.S. Trademark Office, Opposer is listed as the current owner of U.S. Reg. No. 3,843,591. Applicant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 2 and therefore denies the same.
  
3. Applicant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 3 and therefore denies the same.

4. Applicant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 4 and therefore denies the same.

5. Applicant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 5 and therefore denies the same.

6. Insofar as Paragraph 6 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

7. Applicant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 7 and therefore denies the same.

8. Insofar as Paragraph 8 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

9. Applicant admits the allegations contained in Paragraph 9.

10. Applicant admits the allegations contained in Paragraph 10.

11. Insofar as Paragraph 11 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

12. Insofar as Paragraph 12 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

13. Applicant admits only that Applicant intends to use the POWER YOUR DREAMS mark in connection with “Headwear; Footwear; Tops as clothing; Bottoms as clothing; Jackets; Coats; Shirts; Sweatshirts.” Applicant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 13 and therefore denies the same.

14. Applicant admits the allegations contained in Paragraph 14.

15. Insofar as Paragraph 15 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

16. Applicant admits only that Opposer and Applicant have a licensing relationship in connection with some of Applicant's products. Applicant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 16 and therefore denies the same.

17. Insofar as Paragraph 17 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

18. Insofar as Paragraph 18 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

19. Insofar as Paragraph 19 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

20. Insofar as Paragraph 20 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

21. Insofar as Paragraph 21 calls for a legal conclusion, it requires no answer. To the extent an answer is required, Applicant denies the allegations contained therein.

## **AFFIRMATIVE DEFENSES**

Applicant submits the following affirmative defenses:

1. Opposer's Notice of Opposition fails to state a claim upon which relief can be granted.
2. Opposer's THE POWER OF DREAMS mark has not become famous within the meaning of the Lanham Act Section 43(c), 15 U.S.C. § 1125(c).
3. There is no likelihood that registration of the Application will cause dilution by blurring Opposer's THE POWER OF DREAMS mark that is the subject of U.S. Reg. No. 3,843,591.
4. There is no likelihood that registration of the Application will cause confusion with Opposer's THE POWER OF DREAMS mark that is the subject of U.S. Reg. No. 3,843,591.
5. Opposer will sustain no damage, injury, or prejudice as a result of the issuance of a registration to Applicant for the goods described in the Application.

Applicant reserves the right to assert additional affirmative defenses as they may become known through the process of discovery.



