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

Proceeding	91267761
Party	Defendant Ziggi Proizvodnja in Trgovina D.O.O.
Correspondence Address	SEONG-CHEOL SON VOYER LAW 134 ABBOTT STREET, SUITE 403 VANCOUVER, BC, V6B2K4 CANADA Primary Email: ip@voyerlaw.com 604-398-3321
Submission	Answer
Filer's Name	Seong-Cheol Son
Filer's email	IP@voyerlaw.com, seong-cheol@voyerlaw.com
Signature	/seongcheolson/
Date	04/01/2021
Attachments	TTAB Answer.pdf(209769 bytes)

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

Republic Technologies (NA) LLC.)		
an Illinois corporation,)	Opposition No.:	91255271
)	Serial No.:	79/277,539
Opposer)	Trademark:	ZIGGI and Design
)	Filed:	July 17, 2019
v.)	Published:	October 20, 2020
)		
Ziggi Proizvodnja In Trgovina D.O.O.)		
a Slovenian corporation,)		
)		
Applicant)		
)		
_____)		

APPLICANT’S ANSWER TO THE NOTICE OF OPPOSITION

United States Patent and Trademark Office
Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA. 22313-1451

Dear Commissioner Gooder:

Applicant, Ziggi Proizvodnja In Trgovina D.O.O. (“Applicant”), a Slovenian corporation, hereby answers the Notice of Opposition (“Notice”) filed by Republic Technologies (NA) LLC. (“Opposer”) against Application Serial No. 79/277,539 (“Application”) as set forth below.

Answering the first unnumbered paragraph of the Notice, Applicant admits that the mark ZIGGI and Design (“Mark”) is the subject of the Application, which Applicant filed on July 17, 2019, and that Opposer through the Notice opposes registration of the Application. Applicant denies the remaining allegations contained in the first unnumbered paragraph of the Notice.

1. Answering Paragraph 1 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, and on that basis, denies those allegations.

2. Answering Paragraph 2 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, and on that basis, denies those allegations.

3. Answering Paragraph 3 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, and on that basis, denies those allegations.

4. Answering Paragraph 4 of the Notice, Applicant admits that Applicant filed the Application on July 17, 2019, but lacks sufficient knowledge or information to form a belief as to the truth or falsity of the remaining allegations contained therein, and on that basis, denies those allegations.

5. Answering Paragraph 5 of the Notice, Applicant admits it is seeking to obtain trademark protection for those goods identified in the Application, but lacks sufficient knowledge or information to form a belief as to the truth or falsity of the remaining allegations contained therein, and on that basis, denies those allegations.

6. Answering Paragraph 6 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, and on that basis, denies those allegations.

7. Answering Paragraph 7 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations contained therein, and on that basis, denies those allegations.

AFFIRMATIVE DEFENSES

Applicant alleges the following affirmative defense. There may be additional affirmative defenses to the claims in the Notice that are currently unknown to the Application. Therefore, Applicant reserves the right to amend its Answer to the Notice to allege additional affirmative defenses in the event that discovery of additional information indicates they are appropriate.

FIRST AFFIRMATIVE DEFENSE

There is no likelihood of confusion, mistake or deception between the Mark and the Opposer's registered marks.

WHEREFORE, Applicant respectfully requests that the Opposition be dismissed with prejudice and that the Trademark Trial and Appeals Board grant further relief as it shall deem appropriate.

Dated: April 1, 2021

Respectfully submitted,
VOYER LAW



Seong-Cheol Son
134 Abbott Street, Suite 403
Vancouver, BC V6B 2K4
Canada
604-398-3321
seong-cheol@voyerlaw.com
IP@voyerlaw.com

Attorney for Applicant,
Ziggi Proizvodnja In Trgovina D.O.O.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S ANSWER TO THE NOTICE OF OPPOSITION** has been served on April 1, 2021 by emailing said copy to the Opposer's counsel:

Antony J. McShane
Neal, Gerber & Eisenberg LLP
Two North LaSalle Street, Suite 1700
Chicago, IL. 60602-3801
AMcShane@nge.com

and

Abigail E. Flores
Neal, Gerber & Eisenberg LLP
Two North LaSalle Street, Suite 1700
Chicago, IL. 60602-3801
AFlores@nge.com



Seong-Cheol Son