

ESTTA Tracking number: **ESTTA1127459**

Filing date: **04/15/2021**

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

Proceeding	91267905
Party	Defendant Izo All Supply Co. LLC
Correspondence Address	IZO ALL SUPPLY CO. LLC 6309 CHALET DRIVE COMMERCE, CA 90040 UNITED STATES Primary Email: omar@izoallsupplyco.com Secondary Email(s): tmapp@legalzoom.com 323-309-1754
Submission	Answer
Filer's Name	Omar Gonzalez
Filer's email	omar@izoallsupplyco.com
Signature	/Omar Gonzalez/
Date	04/15/2021
Attachments	Answer IzoHomeGoods.pdf(175791 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Serial No. 90084916

For the mark PVH Corp.,
Opposer,

vs.

:
Izo All Supply Co. LLC,

Applicant.

:
:
:
:
:
:

Opposition No. 91267905

:

ANSWER AND GROUNDS OF DEFENSE

COMES NOW the Applicant, Izo All Supply Co. LLC, (hereinafter “Applicant”) and files its Answer and Grounds of Defense to the Notice of Opposition and states as follows:

ANSWER

Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the first Introductory Paragraph of the Notice of Opposition, if any, and therefore denies the same. In response to the specifically enumerated paragraphs of the Notice of Opposition, Applicant responds as follows. Any enumerated paragraphs not specifically responded to are hereby denied.

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

Additional Defenses

In addition, Applicant may rely upon the following additional defenses:

- **Laches:** Check if you have been using your trademark for over a year before the Opposer objected to your use of the same.
- **Unclean Hands:** Check if you think the Opposer is acting unethically or has acted in bad faith with respect to the subject of the complaint.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 12 of April 2021.

/Izo All Supply Co. LLC/

Applicant
6309 CHALET DRIVE
COMMERCE, CA 90040

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Serial No. 90084916

For the mark: PVH Corp.,

Opposer,

vs.

:

Izo All Supply Co. LLC,

Applicant.

:
:
:
:
: Opposition No. 91267905
:
:
:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this Answer to be served, via first class mail, postage prepaid this 12 of April 2021, upon:

PVH CORP.
200 MADISON AVENUE
NEW YORK, NY 10016

/ Izo All Supply Co. LLC /
Izo All Supply Co. LLC