

ESTTA Tracking number: **ESTTA1137478**

Filing date: **06/01/2021**

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

Proceeding	91268838
Party	Defendant Flagship Packaged Products, LLC
Correspondence Address	CLINTON H. WILKINSON WILKINSON LAW OFFICE 70 EAST BROAD STREET P.O. BOX 1426 BETHLEHEM, PA 18016-1426 UNITED STATES Primary Email: wilkinsonlawoffice@gmail.com 610-867-9700
Submission	Answer
Filer's Name	Clinton H. Wilkinson
Filer's email	wilkinsonlawoffice@gmail.com
Signature	/Clinton H. Wilkinson/
Date	06/01/2021
Attachments	2021.06.01 Flagship Products Answer to Opposition 91268838.pdf(102189 bytes)

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

Woodland Equipment & Supply Co.)	Opposition No. 91268838
)	
Opposer,)	Serial No. 90/069447
)	
v.)	Mark: ICE ZING
)	
Flagship Packaged Products, LLC,)	
)	
Applicant.)	

FILED VIA ESTTA

**APPLICANT’S ANSWER
TO OPPOSER’S NOTICE OF OPPOSITION**

Applicant, Flagship Packaged Products, LLC (“Applicant”), by counsel, states as follows for its Answer to the Notice of Opposition (“Notice”) filed by Woodland Equipment & Supply Co. (“Opposer”):

1. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the first paragraph of the Notice, and therefore denies same.
2. Applicant refers to Exhibit 1 of the Notice of Opposition for its content, and lacks sufficient information to form a belief as to the truth of the allegations set forth in the second paragraph of the Notice, and therefore denies same.
3. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the third paragraph of the Notice, and therefore denies same.
4. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the fourth paragraph of the Notice of Opposition, and therefore denies same.
5. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the fifth paragraph of the Notice, and therefore denies same.

6. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the sixth paragraph of the Notice, and therefore denies same.

7. Applicant admits that it is the owner of Application Serial No. 90069447, refers to that application for its scope and content, and denies the allegations set forth in paragraph 7 of the Notice to the extent inconsistent therewith.

8. Applicant admits the allegations set forth in paragraph 8 of the Notice.

9. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the ninth paragraph of the Notice, and therefore denies same.

10. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the tenth paragraph of the Notice, and therefore denies same.

11. Applicant denies the allegations set forth in the eleventh paragraph of the Notice.

12. Applicant denies the allegations set forth in the twelfth paragraph of the Notice.

13. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the thirteenth paragraph of the Notice, and therefore denies same.

14. Applicant lacks sufficient information to form a belief as to the truth of the allegations set forth in the fourteenth paragraph of the Notice, and therefore denies same.

15. Applicant denies the allegations set forth in the fifteenth paragraph of the Notice.

AFFIRMATIVE DEFENSES / COUNTERCLAIMS

Applicant reserves the right to assert any and all affirmative defenses and/or counterclaims to the extent revealed during the course of discovery in this proceeding.

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

Respectfully submitted,

/Clinton H. Wilkinson/

Clinton H. Wilkinson
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*Pennsylvania Bar Association member
and Attorney of record for Applicant,
Flagship Packaged Products, LLC*

Dated: June 1, 2021

PROOF OF SERVICE PURSUANT TO 37 C.F.R. § 2.119(b)

The undersigned hereby certifies that on this 1st day of June 2021, the foregoing pleading was filed via the ESTTA system and that a copy of same was served upon the following counsel of record for Opposer, by electronic mail, at the following e-mail address of record:

BRIAN P. GREGG
McNEES WALLACE & NURICK LLC
Email: bgregg@mcneeslaw.com; trademarks@mcneeslaw.com

/Clinton H. Wilkinson/

Clinton H. Wilkinson
Pennsylvania Bar Association member
and
Attorney of record for Applicant,
Flagship Packaged Products, LLC