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

Proceeding	91270074
Party	Defendant NGK Insulators, Ltd.
Correspondence Address	ANDY I. COREA MURTHA CULLINA 265 CHURCH STREET NEW HAVEN, CT 06510 UNITED STATES Primary Email: ipdocketing@murthalaw.com Secondary Email(s): acorea@murthalaw.com 203-772-7700
Submission	Answer
Filer's Name	Taruna Garg
Filer's email	tgarg@murthalaw.com, acorea@murthalaw.com
Signature	/s/ Taruna Garg
Date	08/03/2021
Attachments	Answer ZNB Opposition FINAL.pdf(118138 bytes )



7. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 7 and therefore denies the same.

8. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 8 and therefore denies the same.

9. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 9 and therefore denies the same.

10. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 10 and therefore denies the same.

11. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 11 and therefore denies the same.

12. Applicant lacks knowledge or information sufficient to form a belief about the truth of the portion of the allegation(s) contained in Paragraph 12 referencing “Stryten’s priority with respect to the GNB Marks and the GNB Goods and Services” and therefore denies the same. Applicant admits that it filed an Application for the ZNB Mark and further states that the contents of the application speak for themselves and do not require an answer.

13. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegation(s) contained in Paragraph 13 and therefore denies the same.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

**FIRST GROUND FOR OPPOSITION – LIKELIHOOD OF CONFUSION**

23. Applicant incorporates by reference its responses to paragraphs 1-22 as if fully set forth herein.

24. Denied.

25. This paragraph contains legal conclusions for which no response is required. To the extent a response is required, Applicant denies the allegations in this paragraph.

**SECOND GROUND FOR OPPOSITION – LACK OF BONA FIDE INTENT**

26. Applicant incorporates by reference its responses to paragraphs 1-25 as if fully set forth herein.

27. Denied.

**THIRD GROUND FOR OPPOSITION – APPLICANT’S MARK IS DESCRIPTIVE**

28. Applicant incorporates by reference its responses to paragraphs 1-27 as if fully set forth herein.

29. Denied.

30. Denied.

**FOURTH GROUND FOR OPPOSITION – APPLICANT’S MARK IS GENERIC**

31. Applicant incorporates by reference its responses to paragraphs 1-30 as if fully set forth herein.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

**SIXTH (sic) GROUND FOR OPPOSITION – FRAUD ON THE USPTO**

38. Applicant incorporates by reference its responses to paragraphs 1-37 as if fully set forth herein.

39. The Applicant admits that the Examining Attorney issued notice refusing registration on May 27, 2020. The Applicant denies the remaining allegations in this paragraph.

40. Admitted.

41. Admitted.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Denied.

47. Paragraph 47 describes a legal standard for fraud in procuring a trademark for which no response is required. To the extent a response is required, Applicant denies the allegations in this paragraph.

48. Denied.

49. Denied.

50. Denied.

51. Denied.
52. Denied.
53. Denied.
54. Applicant denies any allegation not specifically admitted above.

WHEREFORE, Applicant requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition and grant other relief as it deems appropriate.

Dated: August 3, 2021

NGK INSULATORS, LTD.

/s/ Taruna Garg \_\_\_\_\_

Andy I. Corea

Taruna Garg

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2021, I caused a true and correct copy of the foregoing document to be served by email upon the following:

Peter J. Riebling (peter.riebling@rieblinglaw.com)

Jutta M. Frankfurter (jutta.frankfurter@rieblinglaw.com)

/s/ Taruna Garg \_\_\_\_\_  
Taruna Garg