

ESTTA Tracking number: **ESTTA1173401**

Filing date: **11/18/2021**

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

Proceeding	91270401
Party	Defendant Trico Products Corporation
Correspondence Address	JILL J. CHALMERS BRYAN CAVE LEIGHTON PAISNER LLP 90 SOUTH CASCADE AVENUE SUITE 1300 COLORADO SPRINGS, CO 80903 UNITED STATES Primary Email: jill.chalmers@bclplaw.com 719-473-3800
Submission	Answer
Filer's Name	Katherine Keating
Filer's email	katherine.keating@bclplaw.com
Signature	/katherine keating/
Date	11/18/2021
Attachments	Answer FIRST BRANDS class 35.pdf(159105 bytes)

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

VALEO SERVICE,

Opposer,

v.

TRICO PRODUCTS CORPORATION,

Registrant.

Opposition No.: 91,270,401

Answer to Notice of Opposition

Applicant Trico Products Corporation (“Applicant”) hereby answers the Notice of Opposition (“Notice”) filed by Valeo Service (“Opposer”) as follows:

1. Answering paragraph 1 of the Notice, Applicant admits the allegations therein.
2. Answering paragraph 2 of the Notice, Applicant admits the allegations therein.
3. Answering paragraph 3 of the Notice, Applicant admits the allegations therein.
4. Answering paragraph 4 of the Notice, Applicant admits the allegations therein.
5. Answering paragraph 5 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth of the allegations therein and on that basis denies them.
6. Answering paragraph 6 of the Notice, Applicant lacks sufficient knowledge or information to form a belief as to the truth of the allegations therein and on that basis denies them.

7. Answering paragraph 12 of the Notice,¹ Applicant lacks sufficient knowledge or information to form a belief as to the truth of the allegations therein and on that basis denies them.

8. Answering paragraph 14 of the Notice,² Applicant lacks sufficient knowledge or information to form a belief as to the truth of the allegations therein and on that basis denies them.

9. Answering paragraph 15 of the Notice, Applicant denies the allegations therein.

10. Answering paragraph 16 of the Notice, Applicant denies the allegations therein.

11. Answering paragraph 17 of the Notice, Applicant denies the allegations therein.

12. Answering paragraph 18 of the Notice, Applicant denies the allegations therein.

13. Answering paragraph 19 of the Notice, Applicant denies the allegations therein.

14. Answering paragraph 20 of the Notice, Applicant admits the allegations therein.

15. Answering paragraph 21 of the Notice, Applicant denies the allegations therein.

16. Answering paragraph 22 of the Notice, Applicant denies the allegations therein.

Respectfully submitted,
Attorneys for Applicant
TRICO PRODUCTS CORPORATION

Dated: November 18, 2021

By: /katherine keating/
Katherine Keating
katherine.keating@bclplaw.com
Bryan Cave Leighton Paisner LLP
3 Embarcadero Center, 7th Floor
San Francisco, CA 94111

¹ The paragraph numbering in the Notice jumps from paragraph 6 to paragraph 12. There are no paragraphs 7 through 11 in the Notice.

² The paragraph numbering in the Notice jumps from paragraph 12 to paragraph 14. There is no paragraph 13 in the Notice.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing ANSWER TO NOTICE OF OPPOSITION has been served on Bryce J. Maynard of Buchanan Ingersoll & Rooney, PC, counsel for Opposer, by forwarding said copy on November 18, 2021, via email to his e-mail address of record: bryce.maynard@bipc.com.

Signature: /katherine keating/

Date: November 18, 2021