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Filing date: **11/26/2021**

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

Proceeding	91272372
Party	Defendant SUHEUNG CO., LTD.
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Submission	Answer
Filer's Name	Janice Housey
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Date	11/26/2021
Attachments	VG AP Opp 91272372 Answer 11 26 21.pdf(33111 bytes)

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

CAPSUGEL BELGIUM NV, Opposer, v. SUHEUNG CO., LTD., Applicant.	Opp. No. 91272372 Ser. No. 90309282 Mark: VG AP
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ANSWER

Applicant, SUHEUNG CO., LTD. (hereinafter, Applicant), by and through its attorneys, hereby answers the opposition of PAC WORLDWIDE CORPORATION (hereinafter, Opposer) as follows:

1. Applicant is without sufficient information to admit or deny the allegations in this paragraph and therefore, denies the same.
2. Applicant admits.
3. Applicant is without sufficient information to admit or deny the allegations in this paragraph and therefore, denies the same.
4. Applicant admits.
5. Applicant is without sufficient information to admit or deny the allegations in this paragraph and therefore, denies the same.
6. Applicant is without sufficient information to admit or deny the allegations in this paragraph and therefore, denies the same.
7. This paragraph does not require an answer.

8. Applicant denies.

AFFIRMATIVE DEFENSES

1. Opposer fails to state a claim for which relief can be granted in that Opposer has failed to make a claim that it has priority.

2. Applicant reserves the right to amend its answer and to assert additional defenses upon the discovery of more definitive facts and upon the completion of a continuing investigation and discovery.

WHEREFORE, Applicant respectfully requests that the Opposition be dismissed.

Date: November 26, 2021

Respectfully submitted,

By: /s/ Janice Housey
Janice Housey
jhousey@litmuslaw.com

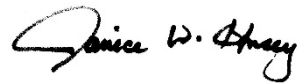
Litmus Law PLLC
PO Box 777
Berryville, Virginia 22611
Phone: 703-957-5274

Attorney for SUHEUNG CO., LTD.

CERTIFICATE OF SERVICE

On this 26th day of November 2021, a true and correct copy of the foregoing ANSWER is being sent via email addressed as follows:

Lawrence J. Crain
Allyson M. Martin
Greer, Burns & Crain, Ltd.
300 South Wacker Drive
Suite 2500
Chicago, Illinois 60606
tmocket@gbc.law; lcrain@gbc.law; smelby@gbc.law; amartin@gbc.law

A handwritten signature in black ink that reads "Steven W. Hasey". The signature is written in a cursive style with a large initial 'S'.