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

| | |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proceeding no. | 91275024 |
| Party | Defendant TRI-KNIT TEXTILE COMPANY LIMITED |
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| Submission | Answer |
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| Date | 04/21/2022 |
| Attachments | 02752090.PDF(25833 bytes) |

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

In re Application Serial Number 90/700,327

THE COMPHY CO.,

Opposer,

v.

TRI-KNIT TEXTILE CO, LTD.,

Applicant.

Opposition No. 91275024

ANSWER TO NOTICE OF OPPOSITION

Applicant, TRI-KNIT TEXTILE CO, LTD. (“Applicant”), by and through its attorneys, Ostrolenk Faber LLP, hereby answers the Notice of Opposition as follows:

In response to the first unnumbered paragraph at the start of the Notice of Opposition, Applicant (i) admits that it filed U.S. Trademark Application Serial No. 90/700,327 on May 10, 2021, containing International Class 24 for “Curtains; Curtains of textile or plastic; Fabrics for textile use; Knitted fabrics; Non-woven fabrics and felts; Textile fabrics for home and commercial interiors; Textile fabrics for the manufacture of clothing; Woven fabrics; Woven fabrics and knitted fabrics; Indoor and outdoor curtains”; and (ii) denies the remaining allegations contained therein.

1. In response to Paragraph 1, Applicant responds that the statement contained therein does not call for a responsive pleading. To the extent Paragraph 1 contains any allegations at all, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 and, accordingly, denies the same.

2. Applicant admits that it is a limited liability private company of Hong Kong having an address of Flat D, 8/F Kato Factory Building, 2, Cheung, Yue Street, Cheung Shawan, Hong Kong, Hong Kong.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 and, accordingly, denies the same.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 and, accordingly, denies the same.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 and, accordingly, denies the same.

6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 and, accordingly, denies the same.

7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 and, accordingly, denies the same.

8. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 and, accordingly, denies the same.

9. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9 and, accordingly, denies the same.

10. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 and, accordingly, denies the same.

11. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 and, accordingly, denies the same.

12. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 and, accordingly, denies the same.

13. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 and, accordingly, denies the same.

14. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 and, accordingly, denies the same.

15. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 and, accordingly, denies the same.

16. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 and, accordingly, denies the same.

17. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17 and, accordingly, denies the same.

18. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 and, accordingly, denies the same.

19. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19 and, accordingly, denies the same.

20. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20 and, accordingly, denies the same.

21. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 and, accordingly, denies the same.

22. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 and, accordingly, denies the same.

23. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 and, accordingly, denies the same.

24. In response to Paragraph 24, Applicant responds that the statement contained therein does not call for a responsive pleading. To the extent Paragraph 24 contains any allegations at all, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 and, accordingly, denies the same.

25. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 and, accordingly, denies the same.

26. Applicant denies the allegations in Paragraph 26.

27. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27 and, accordingly, denies the same.

28. Applicant denies the allegations in Paragraph 28.

29. Applicant denies the allegations in Paragraph 29.

30. In response to Paragraph 30, Applicant restates answers 1 through 29.

31. In response to Paragraph 31, Applicant responds that the statement contained therein calls for a legal conclusion and does not call for a responsive pleading. To the extent Paragraph 31 contains any allegations at all, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 and, accordingly, denies the same.

32. In response to Paragraph 32, Applicant restates answers 1 through 31.

33. In response to Paragraph 33, Applicant responds that the statement contained therein calls for a legal conclusion and does not call for a responsive pleading. To the extent Paragraph 33 contains any allegations at all, Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 and, accordingly, denies the same.

WHEREFORE, Applicant respectfully requests that this Opposition No. 91275024
be dismissed with prejudice.

Dated: 21 April 2022

Respectfully submitted,

/Max Moskowitz/

Max Moskowitz

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** was served upon counsel for Opposer this 21st day of April, 2022, by e-mail, addressed as follows:

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