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

Proceeding no.	91277279
Party	Defendant A ve a Tekstil Sanayi ve Pazarlama Limited Sirketi
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Date	08/22/2022
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Global Brand Holdings LLC,

Opposer,

v.

A ve a Tekstil Sanayi ve Pazarlama Limited Sirketi,

Applicant.

Opposition No. 91277279  
Mark: O X X O (Stylized)  
App. Serial No. 79307822

**ANSWER TO NOTICE OF OPPOSITION**

Applicant A ve a Tekstil Sanayi ve Pazarlama Limited Sirketi (“Applicant”) hereby answers the Notice of Opposition filed by Global Brand Holdings LLC (“Opposer”) as follows:

1. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 1 of the Notice of Opposition and accordingly denies all such allegations.
2. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 2 of the Notice of Opposition and accordingly denies all such allegations.
3. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 3 of the Notice of Opposition and accordingly denies all such allegations.
4. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 4 of the Notice of Opposition and accordingly denies all such allegations.

5. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 5 of the Notice of Opposition and accordingly denies all such allegations.

6. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 6 of the Notice of Opposition and accordingly denies all such allegations.

7. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 7 of the Notice of Opposition and accordingly denies all such allegations.

8. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 8 of the Notice of Opposition and accordingly denies all such allegations.

9. Paragraph 9 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

10. Applicant acknowledges that Exhibit A to the Notice of Opposition appears to consist of TSDR pages for the United States Trademark Registrations described in Paragraph 11 of the Notice of Opposition. Applicant is without sufficient knowledge or information to form a belief as to any and all other allegations contained in Paragraph 10 of the Notice of Opposition and accordingly denies all such allegations.

11. Applicant admits that Paragraph 11 of the Notice of Opposition sets forth certain information that can be found in TSDR. Applicant is without sufficient knowledge or information to form a belief as to any and all other allegations contained in Paragraph 11 of the Notice of Opposition and accordingly denies all such allegations.

12. Paragraph 12 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

13. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 13 of the Notice of Opposition and accordingly denies all such allegations.

14. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 14 of the Notice of Opposition and accordingly denies all such allegations.

15. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 15 of the Notice of Opposition and accordingly denies all such allegations.

16. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 16 of the Notice of Opposition and accordingly denies all such allegations.

17. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 17 of the Notice of Opposition and accordingly denies all such allegations.

18. Paragraph 18 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

19. Applicant admits that its extension of International Registration No. 1583925 to the United States, constituting Application Serial No. 79307822 (“the Application”), has an effective filing date in the United States of December 14, 2020, and that the goods designated in the extension have been amended from “Clothing, including underwear and outerclothing, other than special purpose protective clothing; socks, mufflers [clothing], shawls, bandanas, scarves, belts [clothing]; footwear, shoes, slippers, sandals; headgear, hats, caps with visors, berets, caps [headwear], skull caps” to the current identification of “Clothing, namely, underwear and outerclothing, other than special purpose protective clothing, namely, coats, jackets, vests, cardigans, sweaters, sweatshirts, trench coats, gloves; socks, mufflers being

scarves, shawls, bandanas, scarves, belts; footwear, shoes, slippers, sandals; headwear, hats, caps with visors, berets, caps being headwear, skull caps.”

20. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 20 of the Notice of Opposition and accordingly denies all such allegations.

21. Applicant admits that it had some awareness of Opposer’s use of and registrations for XOXO prior to filing for the extension of International Registration No. 1583925 to the United States, as Applicant was in discussions with Opposer at that time. Applicant denies any and all other allegations of Paragraph 21 of the Notice of Opposition.

22. Applicant admits that Applicant and Opposer had entered into negotiations prior to Applicant filing for the extension of International Registration No. 1583925 to the United States, that the companies had set forth various positions, and that said negotiations had not yet concluded at the time of filing. Applicant denies any and all other allegations of Paragraph 22 of the Notice of Opposition.

23. Paragraph 23 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

24. Applicant is without sufficient knowledge or information to form a belief as to the allegations contained in Paragraph 24 of the Notice of Opposition and accordingly denies all such allegations.

25. Paragraph 25 of the Notice of Opposition appear to set forth a legal conclusion in related to goods being “related,” but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations. Applicant is without sufficient knowledge or information to form a belief as to the allegations concerning goods “sold” and accordingly denies all such allegations.

26. Paragraph 26 of the Notice of Opposition merely incorporates earlier paragraphs by reference. To the extent this paragraph is understood to comprise any allegation in itself, Applicant denies said allegations.

27. Paragraph 27 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

28. Paragraph 28 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

29. Paragraph 29 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

30. Paragraph 30 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

31. Paragraph 31 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

32. Paragraph 32 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

33. Paragraph 33 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

34. Paragraph 34 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

35. Paragraph 35 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

36. Paragraph 36 of the Notice of Opposition merely incorporates earlier paragraphs by reference. To the extent this paragraph is understood to comprise any allegation in itself, Applicant denies said allegations.

37. Paragraph 37 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

38. Paragraph 38 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

39. Paragraph 39 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

40. Paragraph 40 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

41. Paragraph 41 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

42. Paragraph 42 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

43. Paragraph 43 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

44. Paragraph 44 of the Notice of Opposition merely incorporates earlier paragraphs by reference. To the extent this paragraph is understood to comprise any allegation in itself, Applicant denies said allegations.

45. Paragraph 45 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

46. Paragraph 46 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

47. Paragraph 47 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

48. Paragraph 48 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

49. Paragraph 49 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

50. Paragraph 50 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

51. Paragraph 51 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

52. Paragraph 52 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.



53. Paragraph 53 of the Notice of Opposition appear to set forth a legal conclusion, but to the extent that any phrase therein comprises an allegation of fact, Applicant denies said allegations.

54. Paragraph 54 of the Notice of Opposition merely incorporates earlier paragraphs by reference. To the extent this paragraph is understood to comprise any allegation in itself, Applicant denies said allegations.

55. Applicant admits the allegations of Paragraph 55 of the Notice of Opposition.

56. Applicant admits the allegations of Paragraph 56 of the Notice of Opposition.

57. Applicant admits the allegations of Paragraph 57 of the Notice of Opposition.

58. Applicant is not aware of products bearing Applicant's O X X O (stylized) mark being sold through any stores in the U.S.

59. Applicant denies the allegations of Paragraph 59 of the Notice of Opposition.

WHEREFORE, Applicant prays that Opposer's Notice of Opposition be dismissed and that judgment be entered in favor of Applicant.

Respectfully submitted,

Dated: August 22, 2022

/JeffersonScher/  
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CERTIFICATE OF TRANSMITTAL

I hereby certify that a true copy of the foregoing ANSWER TO NOTICE OF OPPOSITION is being filed electronically with the TTAB via ESTTA on this 22nd day of August, 2022.

/JeffersonScher/  
Jefferson F. Scher

CERTIFICATE OF SERVICE BY EMAIL

I hereby certify that a true and complete copy of the foregoing ANSWER TO NOTICE OF OPPOSITION has been served on counsel for Opposer by forwarding said copy on August 22, 2022, via email to:

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/JeffersonScher/  
Jefferson F. Scher