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Filing date: **09/06/2022**

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

Proceeding no.	91277617
Party	Defendant HH Pacific Beach LP
Correspondence address	ADAM C. REHM POLSINELLI PC 900 W. 48TH PLACE, SUITE 900 KANSAS CITY, MO 64112 UNITED STATES Primary email: uspt@polsinelli.com Secondary email(s): arehm@polsinelli.com, jwillard@polsinelli.com 214-661-5578
Submission	Answer
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Signature	/Daniel Mullarkey/
Date	09/06/2022
Attachments	113350-735680 Answer The Wonderflow Company LLC v. HH Pacific Beach L P 91277617.pdf(77924 bytes)

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

The Wonderful Company LLC)	
)	Opposition No. 91277617
Opposer,)	
)	Application Serial No. 90893494
v.)	
)	Mark: WONDERFLOW
HH Pacific Beach LP)	
)	
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

Applicant, HH Pacific Beach LP (“Applicant”) answers the Notice of Opposition filed by The Wonderful Company LLC (“Opposer”) as follows.

1. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 1 of Opposer’s Notice of Opposition and, therefore, denies same.

2. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 2 of Opposer’s Notice of Opposition and, therefore, denies same.

3. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 3 of Opposer’s Notice of Opposition and, therefore, denies same.

4. Applicant admits that Opposer is the last listed owner in the USPTO records for the trademarks identified by Registration Nos. 2780314, 2864641, 3687491, 3687492, 4965046, and 4951549 and Application Nos. 90245957, and 90245959. Applicant is without knowledge or information sufficient to affirm or deny the remaining allegations in paragraph 4 and, therefore, denies same.

5. Applicant admits that Opposer is the last listed owner in the USPTO records for the trademarks identified by Registration Nos. 4552106, 4897336, 3907814, and 4713238. Applicant is without knowledge or information sufficient to affirm or deny the remaining allegations in paragraph 5 and, therefore, denies same.

6. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 6 of Opposer's Notice of Opposition and, therefore, denies same.

7. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 7 of Opposer's Notice of Opposition and, therefore, denies same.

8. Applicant is without knowledge or information sufficient to affirm or deny the allegations contained in paragraph 8 of Opposer's Notice of Opposition and, therefore, denies same.

9. Admitted.

10. Admitted.

11. No response required.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

PRAYER FOR RELIEF

Applicant prays that the Board overrule Opposer's objections to Applicant's Application and allow the Application to proceed to registration.

Respectfully submitted,

Dated: September 6, 2022

By: /s/Daniel P. Mullarkey

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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing ANSWER TO NOTICE OF OPPOSITION has been served on Roll Law Group P.C. by forwarding said copy on September 6, 2022, via email to:

Danielle M. Criona, Esq.
Roll Law Group P.C.
11444 West Olympic Blvd.
Los Angeles, CA 90064
danielle.criona@roll.com
ipdocketing@roll.com

Signature: /Joy Willard/

CERTIFICATE OF FILING

I hereby certify that the foregoing ANSWER TO NOTICE OF OPPOSITION is being electronically transmitted via the Electronic System for Trademark Trials and Appeals (“ESTTA”) at <https://estta.uspto.gov/> on September 6, 2022.

Signature: /Joy Willard/