

ESTTA Tracking number: **ESTTA1250859**

Filing date: **11/29/2022**

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

Proceeding no.	91281301
Party	Defendant Jaguar Land Rover Limited
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Submission	Answer
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Signature	/Chanille Carswell/
Date	11/29/2022
Attachments	Amended Answer to NOO 11-29-22.pdf(137518 bytes)

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

A Place for Rover, Inc.,)	
)	
Opposer,)	
)	Serial No. 90827497
v.)	
)	Opposition No. 91281301
Jaguar Land Rover Limited,)	
)	
Applicant.)	

**APPLICANT JAGUAR LAND ROVER LIMITED’S
AMENDED ANSWER TO NOTICE OF OPPOSITION**

Applicant Jaguar Land Rover Limited (“JLR”) respectfully submits its Answer to Opposer A Place for Rover, Inc.’s (“APR”) Notice of Opposition:

1. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.
2. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.
3. JLR admits that Exhibits A and B of the Notice of Opposition list applications and registrations of record with the United States Patent and Trademark Office (“USPTO”). JLR is without sufficient information to admit or deny the remaining allegations of this Paragraph and therefore denies the same.
4. JLR admits that Registration No. 4493276 for ROVER was filed on January 18, 2012 and lists the followings goods in Class 35: “Providing online referral and appointment

scheduling services in the field of dog care services conducted via a global computer network; matching consumers with professional dog care service providers via a global computer network.” JLR is without sufficient information to admit or deny the remaining allegations of this Paragraph and therefore denies the same.

5. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

6. Admitted.

7. Admitted.

8. The assertion in this Paragraph does not state a fact or claim that requires JLR’s response. However, JLR acknowledges Opposer’s assertion that it only opposes the following goods in JLR’s pending Application: “pet bowls; pet drinking vessels being pet drinking bowls; pet feeding vessels being pet feeding dishes; feeding tables for birds.”

9. JLR admits that Application No. 90827497 (“Applicant’s Mark”) contains the term ROVER. To the extent further response is required, JLR denies the remaining allegations of this Paragraph.

10. Applicant’s Mark and the listed goods speak for themselves. To the extent further response is required, JLR denies the remaining allegations of this Paragraph.

11. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

12. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

13. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

14. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

15. The Parties' record applications and registrations speak for themselves. To the extent further response is required, JLR denies the remaining allegations of this Paragraph.

16. JLR is without sufficient information to admit or deny the allegations of this Paragraph and therefore denies the same.

17. Denied.

18. Denied.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

As the first affirmative defense, JLR alleges that it has priority for use of the mark in connection with the goods and services at issue in this proceeding.

SECOND AFFIRMATIVE DEFENSE

As the second affirmative defense, JLR alleges that Opposer's Notice of Opposition fails to state a claim upon which relief can be granted.

THIRD AFFIRMATIVE DEFENSE

As the third affirmative defense, JLR alleges that Opposer's Notice of Opposition is barred by the doctrines of waiver, acquiescence and/or estoppel.

Applicant reserves the right to amend its Answer to assert further affirmative defenses as they become known or available.

WHEREFORE, JLR prays that the Board dismiss Opposer's Notice of Opposition.

Respectfully submitted,

By: /Chanille Carswell/
Chanille Carswell

Attorneys/Agents for Opposer

Date: November 29, 2022

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CERTIFICATE OF SERVICE

I certify that I served:

**APPLICANT JAGUAR LAND ROVER LIMITED'S
ANSWER TO NOTICE OF OPPOSITION**

on November 29, 2022 by email to:

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Attorney for Opposer

/s/ Chanille Carswell
Chanille Carswell