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Filing date: **12/12/2022**

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

Proceeding no.	91281493
Party	Defendant GARAN SERVICES CORP.
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Date	12/12/2022
Attachments	Garan Answer to Notice of Opposition No. 91281493 Peapod.pdf(16523 bytes )

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

In the matter of Application Serial No. 97027110

Mark: 

Saucony IP Holdings LLC., Opposer,  v.  Garan Services, Inc.,  Applicant.
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Opposition No.: 91281493

**UNITED STATES PATENT AND TRADEMARK OFFICE**  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**APPLICANT’S ANSWER TO OPPOSER’S NOTICE OF OPPOSITION**

Applicant, Garan Services Corp. (“Applicant”), by and through its undersigned counsel hereby submits its Answer to the Notice of Opposition, filed by Saucony IP Holdings LLC (“Opposer”) on October 31, 2022.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 1 and denies them on that basis.
2. Applicant admits the allegations contained in Paragraph 2.
3. The allegations contained in Paragraph 3 constitute legal conclusions to which no response is required. To the extent a response is deemed required, Applicant denies the allegations.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 4 and denies them on that basis.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 5 and denies them on that basis.

6. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 6 and denies them on that basis.

7. The allegations contained in Paragraph 7 constitute legal conclusions to which no response is required. Furthermore, there is no such thing as an “incontestable registration.” To the extent a response is deemed required, Applicant denies the allegations.

8. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 8 and denies them on that basis.

9. Applicant admits the allegations in Paragraph 9.

10. Applicant admits the allegations in Paragraph 10.

11. Applicant incorporates and realleges its responses set forth above.

12. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 12 and denies them on that basis.

13. Applicant denies the allegations in Paragraph 13.

14. Applicant denies the allegations in Paragraph 14..

15. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 15 and denies them on that basis.

16. Applicant denies the allegations in Paragraph 16.

**WHEREFORE**, having fully answered, Applicant prays for judgment against Opposer, dismissing the Opposition with prejudice, and awarding Applicant such other and further relief as the Board deems just and equitable.

Dated: New York, New York  
December 12, 2022

DAVIS WRIGHT TREMAINE LLP

By: /G. Roxanne Elings  
G. Roxanne Elings  
Nicole Medeiros

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*Attorneys for Applicant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of December, 2022, a true and complete copy of the foregoing **APPLICANT’S ANSWER TO OPPOSER’S NOTICE OF OPPOSITION** has been served upon Opposer’s counsel of record by delivering the same via electronic mail to Brian D. Wassom at the following address: bwassom@wnj.com.

/s/ Kimberly Simmons-Greene  
Kimberly Simmons-Greene