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Filing date: **04/14/2023**

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

Proceeding no.	91283248
Party	Plaintiff TÄ¼rkiye'nin Otomobili Girişim Grubu Sanayi Ve Ticaret A.S.
Correspondence address	P. JAY HINES MUNCY, GEISLER, OLDS & LOWE, P.C. 4000 LEGATO ROAD SUITE 310 FAIRFAX, VA 22033 UNITED STATES Primary email: mailroom@mg-ip.com Secondary email(s): jh@mg-ip.com 703-621-7140
Submission	Answer to Counterclaim
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Date	04/14/2023
Attachments	2023-04-14 Answer to Conterclaim.pdf(160581 bytes)

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

_____)	
TÜRKIYE'NIN OTOMOBİLİ GİRİSİM)	
GRUBU SANAYİ VE TİCARET A.S.)	
)	Opposition No.: 91283248
Opposer,)	
)	Application No.: 97069578
v.)	Mark: TOGG
)	
TCB Associates Inc.)	
)	
Applicant.)	
_____)	

OPPOSER’S ANSWER TO COUNTERCLAIM

Opposer, TÜRKIYE'NIN OTOMOBİLİ GİRİSİM GRUBU SANAYİ VE TİCARET A.S., through counsel, by way of its Answer to the Counterclaim filed by TCB Associates Inc., hereby states as follows:

1. Opposer admits the allegations of Paragraph 1 of the Counterclaim.
2. Opposer admits the allegations of Paragraph 2 of the Counterclaim.
3. Opposer admits the allegations of Paragraph 3 of the Counterclaim.
4. Opposer admits the allegations of Paragraph 4 of the Counterclaim.
5. Opposer admits the allegations of Paragraph 5 of the Counterclaim.
6. Opposer does not have knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Counterclaim, and therefore denies the allegations, demanding strict proof thereof.

7. Opposer does not have knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Counterclaim, and therefore denies the allegations, demanding strict proof thereof.
8. Opposer admits the allegations of Paragraph 8 of the Counterclaim.
9. Opposer denies the allegations of Paragraph 9 of the Counterclaim.
10. Opposer admits the allegations of Paragraph 10 of the Counterclaim.
11. Opposer admits the allegations of Paragraph 11 of the Counterclaim.
12. Opposer is unable to admit or deny the allegations of Paragraph 12 of the Counterclaim as pre-orders are being taken for some of its Class 12 goods.
13. Opposer admits the allegations of Paragraph 13 of the Counterclaim.
14. Opposer denies the allegations of Paragraph 14 of the Counterclaim.
15. Paragraph 15 contains no allegations requiring a pleading.
16. Opposer does not have knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the Counterclaim, and therefore denies the allegations, demanding strict proof thereof.
17. Opposer does not have knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Counterclaim, and therefore denies the allegations, demanding strict proof thereof.
18. Opposer admits the allegations of Paragraph 18 of the Counterclaim.
19. Opposer admits that the marks in the allegation of Paragraph 19 of the Counterclaim are similar but denies that they are highly similar.
20. Opposer denies the allegations of Paragraph 20 of the Counterclaim.
21. Opposer admits the allegations of Paragraph 21 of the Counterclaim.
22. Opposer does not have knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Counterclaim, and therefore denies the

allegations, demanding strict proof thereof.

23. Opposer denies the allegations of Paragraph 23 of the Counterclaim.

24. Opposer admits the allegations of the first sentence of Paragraph 24 of the Counterclaim but denies the allegations of the second sentence.

25. Opposer denies the allegations of Paragraph 25 of the Counterclaim.

26. Paragraph 26 contains no allegations requiring a pleading.

27. Opposer denies the allegations of Paragraph 27 of the Counterclaim.

28. Opposer denies the allegations of Paragraph 28 of the Counterclaim.

29. Opposer denies the allegations of Paragraph 29 of the Counterclaim.

30. Opposer denies the allegations of Paragraph 30 of the Counterclaim.

31. Opposer denies the allegations of Paragraph 31 of the Counterclaim.

32. Opposer denies the allegations of Paragraph 32 of the Counterclaim.

33. Opposer denies the allegations of Paragraph 33 of the Counterclaim.

34. Opposer denies the allegations of Paragraph 34 of the Counterclaim.

35. Opposer denies the allegations of Paragraph 35 of the Counterclaim.

36. Opposer denies the allegations of Paragraph 36 of the Counterclaim.

37. Opposer denies the allegations of Paragraph 37 of the Counterclaim.

38. Opposer denies the allegations of Paragraph 38 of the Counterclaim.

39. Opposer denies the allegations of Paragraph 39 of the Counterclaim.

40. Opposer denies the allegations of Paragraph 40 of the Counterclaim.

41. Opposer denies the allegations of Paragraph 41 of the Counterclaim.

AFFIRMATIVE DEFENSES

CERTIFICATE OF TRANSMISSION AND SERVICE

I certify that the foregoing NOTICE OF OPPOSITION is being electronically filed with:

Trademark Trial and Appeal Board

P.O. Box 1451

Alexandria, VA 22313

and that a courtesy copy of the foregoing NOTICE OF OPPOSITION is being sent via email to:
jgreger@rcsc-ip.com, tcole@rcsc-ip.com, trademarks@rcsc-ip.com .

Jeffrey H. Greger

ROBERTS CALDERON SAFRAN & COLE PC

7918 JONES BRANCH DRIVE, SUITE 500

MCLEAN, VIRGINIA 22102

This 14th day of April, 2023.

/PJayHines/

Exhibit 1