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

Proceeding no.	91291020
Party	Defendant Sikh Helmets Inc.
Correspondence address	MITCHELL J. STOCK BOYLE FREDICKSON, SC 840 N. PLANKINTON AVE. MILWAUKEE, WI 53203 UNITED STATES Primary email: docketing@boylefred.com Secondary email(s): apotter@boylefred.com, mjs@boylefred.com 414-225-6316
Submission	Answer
Filer's name	Mitchell J. Stock
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Signature	/Mitchell J.Stock/
Date	05/28/2024
Attachments	02284637.PDF(80432 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

PROCEEDING NO. 91291020

Milwaukee Electric Tool Corporation,

Opposer,

v.

Sikh Helmets Inc.,

Applicant.

Serial No. 97757088

Mark: BOLD HELMETS

ANSWER TO NOTICE OF OPPOSITION

Respondent, Sikh Helmets Inc. (“Applicant”), by its attorneys, Boyle Fredrickson, S.C., as and for its Answer to the claims asserted in the Notice of Opposition (“Opposition”) filed on behalf of Opposer, Milwaukee Tool Corporation (“Opposer”), denies that Opposer will be damaged by the registration of Applicant’s mark BOLD HELMETS (“Applicant’s Mark”) in Application No. 97757088 (the “Application”).

With respect to the specific assertions in the Opposition, Applicant respectfully responds as follows:

1. Applicant admits Applicant is a Canadian corporation with a mailing address of P.O. Box 30076, Brampton, Ontario, Canada L6R0S9.
2. Applicant admits Applicant filed its intent-to-use Application on January 17, 2023.
3. Applicant admits the allegations in Paragraph 3 of the Opposition.

4. Denied.
5. Denied.
6. Applicant is without sufficient information to admit or deny the allegations in Paragraph 6 of the Opposition and therefore denies the same.
7. Applicant admits Opposer filed U.S. Application Nos. 98446681 and 98446682 for Opposer's Mark.
8. Applicant is without sufficient information to admit or deny the allegations in Paragraph 8 of the Opposition and therefore denies the same.
9. Denied.
10. Applicant is without sufficient information to admit or deny the allegations in Paragraph 10 of the Opposition and therefore denies the same.
11. Denied.
12. Denied.
13. Denied.

**COUNT I
PRIORITY AND LIKELIHOOD OF CONFUSION**

14. Applicant realleges and incorporates by reference the responses contained in Paragraphs 1 through 13 above as if fully set forth herein.
15. Denied.

**COUNT II
NO BONA FIDE INTENT**

16. Applicant realleges and incorporates by reference the responses contained in Paragraphs 1 through 15 above as if fully set forth herein.
17. Denied.

AFFIRMATIVE DEFENSES

1. There is no likelihood of confusion between Applicant's mark and Opposer's marks and therefore there is no basis for irreparable harm.

WHEREFORE Applicants respectfully requests that the Opposition be denied and/or dismissed in its entirety.

Date: May 28, 2024

/Mitchell J. Stock/

Mitchell J. Stock
Boyle Fredrickson, S.C.
840 N. Plankinton
Milwaukee, WI 53203

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served by forwarding said copy on May 28, 2024 via email to:

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/Mitchell J. Stock/
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