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Filing date: **09/29/2024**

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

Proceeding no.	91293548
Party	Defendant Brian Yu Zheng
Correspondence address	TODD WENGROVSKY ALW OFFICES OF TODD WENGROVSKY, PLLC 285 SOUTHFIELD ROAD, BOX 585 CALVERTON, NY 11933 UNITED STATES Primary email: contact@twlegal.com 631-727-3400
Submission	Answer
Filer's name	Todd Wengrovsky
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Signature	/s/ Todd Wengrovsky
Date	09/29/2024
Attachments	Zheng Yucca TTAB Answer.pdf(136327 bytes )

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

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Yucca (Jersey) SLP,

Opposer,

-against-

Proceeding No. 91293548

Brian Yu Zheng,

Applicant.

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**APPLICANT'S ANSWER TO  
OPPOSITION**

Applicant Brian Yu Zheng, by attorney Todd Wengrovsky, hereby responds to the Opposition filed by Yucca (Jersey) SLP as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the Opposition.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the Opposition.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the Opposition.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the Opposition.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the Opposition.

6. Applicant denies the allegations contained in this Paragraph of the Opposition, as Opposer's Registrations are not relevant to Applicant.

7. Applicant admits the allegations contained in this Paragraph of the Opposition.

8. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

9. Applicant admits the allegations contained in this Paragraph of the Opposition, with the further comment that no approval was necessary.

10. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

“COUNT I” SECTION OF OPPOSITION

11. Applicant repeats and incorporates by reference its replies in Paragraphs 1 through 10 herein inclusive.

12. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

13. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

14. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

15. Applicant denies each and every allegation contained in this Paragraph of the Opposition.

APPLICANT’S AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Opposition fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Opposer can not demonstrate injury, impact, or damage as a result of any actions by Applicant.

THIRD AFFIRMATIVE DEFENSE

Opposer lacks standing to maintain the Opposition.

FOURTH AFFIRMATIVE DEFENSE

Opposer is barred from recovery by reason of waiver and/or estoppel.

FIFTH AFFIRMATIVE DEFENSE

Opposer’s claims are barred by the doctrine of acquiescence.

**WHEREFORE,** Applicant requests that the Opposition be dismissed in its entirety with prejudice.

Dated: Calverton, New York  
September 29, 2024

/s/ Todd Wengrovsky  
Todd Wengrovsky  
Law Offices of  
Todd Wengrovsky, PLLC.  
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Tel (631) 727-3400  
*Attorney for Applicant*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2024, a copy of the foregoing Applicant's Answer to Opposition was electronically filed with the United States Patent and Trademark Office and that a copy was served upon Opposer's attorney of record via electronic mail to:

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