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

Proceeding no.	91294700
Party	Defendant Quanzhou Taiwanese Investment Zone Sanjingchuan Trading Co., Ltd.
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Date	11/30/2024
Attachments	Answer to Notice of Cancellation No. 91294700.pdf(101629 bytes)

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

Skechers U.S.A. Inc., and Skechers U.S.A. Inc., II,

Opposers,

v.

Quanzhou Taiwanese Investment Zone
Sanjingchuan Trading Co., Ltd,

Applicant,

Opposition No. 91294700
Serial No. 98/304,647

Regarding Registration No. 98304647

Mark: S STQ

ANSWER

Quanzhou Taiwanese Investment Zone Sanjingchuan Trading Co., Ltd (hereinafter, the “Applicant”, or “Respondent”), a limited company incorporated in Taiwan, in response to the Notice of Opposition (hereinafter, the “Notice”) filed by Skechers U.S.A. Inc., and Skechers U.S.A. Inc., (hereinafter, the “Petitioner”) regarding the former’s application regarding U.S. Trademark Registration No. 98304647 S STQ, which is at issue of Petitioner’s Opposition (hereinafter, the “Challenged Application”), respectfully submits as follows:

1. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶1 of the Notice.
2. Paragraph 2 of the Notice contains a legal conclusion to which no response is required. To the extent a response is required, Respondent is without

knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶2 of the Notice.

3. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶3 of the Notice.
4. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶4 of the Notice.
5. Respondent admits the truth of the allegations contained in the first sentence of ¶5 of the Notice. Respondent admits the truth of the allegations contained in the second sentence of ¶5 of the Notice.
6. Paragraph 6 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations.
7. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶7 of the Notice.
8. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶8 of the Notice.
9. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in ¶9 of the Notice.
10. Paragraph 10 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶10.

COUNT ONE

11. No response is required for the allegations contained in ¶11.

12. Respondent is without knowledge or information sufficient to form a basis as to the truth of the allegations contained in ¶12 of the Notice.
13. Respondent admits that it applied for the referenced “Challenged Application”.
14. Respondent admits its identity and location as listed in ¶14 of the Notice.
15. Respondent is without knowledge or information sufficient to form a basis as to the truth of the allegations contained in ¶15 of the Notice. As to the last sentence of ¶15, no response is required as it contains a legal statement.
16. Paragraph 16 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶16.
17. Paragraph 17 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶17.
18. Paragraph 18 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶18.

COUNT TWO

19. No response is required for the allegations contained in ¶19.
20. Paragraph 20 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶20. Respondent specifically denies that the mark in the

Challenged Application closely resembles Skechers Registration for its “S” Marks.

21. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶21.
22. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶22.
23. Paragraph 23 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶23. Respondent specifically denies that the mark in the Challenged Application closely resembles Skechers Registration for its “S” Marks.
24. Paragraph 24 of the Notice contains legal conclusion to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in ¶24. Respondent repeats that it specifically denies that the mark in the Challenged Application closely resembles Skechers Registration for its “S” Marks.

FIRST AFFIRMATIVE DEFENSE

No similarity

1. The Notice shall be denied due to no similarities could be found between the mark in the Challenged Application and Skechers Registration for its “S” Marks.

SECOND AFFIRMATIVE DEFENSE

No confusion

2. The Notice shall be denied as there will be no confusion between goods carrying the the mark in the Challenged Application and Skechers “S” Marks.

THIRD AFFIRMATIVE DEFENSE

Waiver

3. The Notice is barred in whole or in part by waiver.

FOURTH AFFIRMATIVE DEFENSE

Laches

4. The Notice is barred in whole or in part by laches.

FIFTH AFFIRMATIVE DEFENSE

Estoppel

5. The Notice is barred in whole or in part by estoppel.

SIXTH AFFIRMATIVE DEFENSE

Reservation of Right for Additional Defenses

6. Respondent currently lacks sufficient information to determine if additional affirmative defenses are available in light of the facts and circumstances alleged in the Notice. Respondent reserves the right to assert additional defenses in the event discovery indicates these additional affirmative defenses would be available

WHEREFORE, Respondent pray for ruling as follows:

1. The Opposition shall be denied.

Dated: November 26, 2024

Respectfully submitted
By: /s/ Marjorie Ouyang
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Marjorie.ouyang@alioithlaw.com
Attorney for Respondent

PROOF OF SERVICE

I hereby certify that a true and complete copy of the foregoing ANSWER has been served on Ian R. Washburn by forward said copy on November 30, 2024, via email to iwashburn@irell.com.

Dated: November 30, 2024

Respectfully submitted
By: */s/ Marjorie Ouyang*
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Attorney for Respondent