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

<b>Proceeding</b>	91156321
<b>Party</b>	Plaintiff THE CHAMBER OF COMMERCE OF THE UNITED ST ,
<b>Correspondence Address</b>	William M. Merone Kenyon & Kenyon 1500 K Street, N.W., Suite 700 Washington, DC 20005
<b>Submission</b>	Answer to Counterclaim
<b>Filer's Name</b>	William M. Merone
<b>Filer's e-mail</b>	wmerone@kenyon.com
<b>Signature</b>	/William M. Merone/
<b>Date</b>	10/13/2005
<b>Attachments</b>	Reply to Counterclaim.pdf ( 4 pages )

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

THE CHAMBER OF COMMERCE OF  
THE UNITED STATES OF AMERICA

*Opposer,*

v.

UNITED STATES HISPANIC CHAMBER  
OF COMMERCE FOUNDATION,

*Applicant.*

Opposition No.: 91/156,321

Serial No.: 78/081,731

**REPLY TO APPLICANT'S COUNTERCLAIMS**

Opposer, The Chamber of Commerce of the United States of America, answers the Counterclaims filed by Applicant, the United States Hispanic Chamber of Commerce Foundation, as follows, with each numbered paragraph corresponding to the similarly numbered paragraph in the Counterclaims as set forth below. Unless expressly admitted, all allegations raised in the Counterclaims are hereby denied.

**RESPONSE TO COUNTERCLAIMS**

1. Opposer lacks sufficient information to admit or deny the allegations of paragraph 1 and therefore denies same.
2. Admitted.
3. Opposer admits only that it offers "association services; namely promoting the interests of business men and women," and that its activities and

membership are national in scope. Opposer lacks sufficient information to admit or deny the allegations of paragraph 3 as pertains to Applicant's activities or membership and therefore denies same.

4. Applicant's allegations in paragraph 4 are merely argumentative in nature and therefore no substantive response should be required. Further, the "evidence" to which Applicant cites does not even support the position that Applicant purports to advance. Finally, Applicant's allegations are vague and indefinite, making a meaningful response impossible. To the extent that a substantive response is required, however, the allegations of paragraph 4 as Opposer understands them are denied.
5. Applicant's allegations in paragraph 5 are merely argumentative in nature and therefore no substantive response should be required. Further, the "evidence" to which Applicant cites does not even support the position that Applicant purports to advance. Finally, Applicant's allegations are vague and indefinite, making a meaningful response impossible. To the extent that a substantive response is required, however, the allegations of paragraph 5 as Opposer understands them are denied.
6. Applicant's allegations in paragraph 6 are merely argumentative in nature and therefore no substantive response should be required. Further, the "evidence" to which Applicant cites does not even support the position that Applicant purports to advance. Finally, Applicant's allegations are vague and indefinite, making a meaningful response impossible. To the

extent that a substantive response is required, however, the allegations of paragraph 6 as Opposer understands them are denied.

7. Denied.
8. No substantive response is required.

#### **PRAYER FOR RELIEF**

Opposer submits that Applicant's counterclaims lack merit and therefore denies that Applicant is entitled to any of the requested relief.

#### **SEPARATE DEFENSES**

Opposer respectfully raises at least the following separate defenses against the counterclaims filed by Applicant:

1. The counterclaims fail to state a claim upon which relief can be granted.

Respectfully submitted,

Date: October 13, 2005

/s/ William M. Merone  
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*Counsel for Opposer, The Chamber of  
Commerce of the United States of America*

## CERTIFICATE OF SERVICE

I hereby certify that the required number of copies of the foregoing *Reply to Applicant's Counterclaims* was served on the parties or counsel on the date and as indicated below:

***By First Class Mail (Postage Prepaid)***

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Date: October 13, 2005

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