

ESTTA Tracking number: **ESTTA37579**

Filing date: **07/05/2005**

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

Proceeding	91165341
Party	Defendant Primo Holdings Capital LLC Primo Holdings Capital LLC 21 Lakeside Rd. Mahopac, NY 10541
Correspondence Address	Mark Goldfine Primo Holdings Capital LLC 13 Big Trail Extension Sherman, CT 06784
Submission	Answer
Filer's Name	CHARU NARANG
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Signature	/CHARU NARANG/
Date	07/05/2005
Attachments	ANSWER7-05-05.pdf (2 pages)

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

In Re Application Serial No.: 78/394,518
Mark: WORLD CUP OF ONLINE POKER
Filed: April 1, 2004
Published: January 25, 2005

Rational Enterprises Limitida,)	
)	
Opposer,)	
)	
v.)	Opposition No.: 91165341
)	
Primo Holdings Capital, I.L.C.,)	
)	
Applicant.)	
)	
)	

ANSWER TO NOTICE OF OPPOSITION

Primo Holdings Capital, LLC, (hereinafter "Primo"), Answers Opposer's Notice of Opposition by and through its attorney, Charu Narang, Esq., as follows:

1. Applicant does not have personal knowledge of the allegations of Paragraph 1 of the Notice of Opposition, and, therefore, neither admits nor denies same at this time.
2. Applicant does not have personal knowledge of the allegations of Paragraph 2 of the Notice of Opposition, and, therefore, neither admits nor denies same at this time.
3. Applicant denies Paragraph 3 of the Notice of Opposition. Applicants address is 13 Big Trail Extension, Sherman, CT 06784.
4. Applicant admits Paragraph 4 of the Notice of Opposition.

5. Applicant admits Paragraph 5 of the Notice of Opposition.
6. Applicant denies the allegations of Paragraph 6 of the Notice of Opposition.
7. Applicant admits only that it is seeking to register the mark WORLD CUP OF ONLINE POKER for gaming services offered through the internet, as stated in Paragraphs 6a-d of the Notice of Opposition. Applicant denies that its mark is confusingly similar to any of Opposer's marks.

WHEREFORE, Applicant requests that the Board dismiss this Opposition, allow Applicant's mark to be registered and award Applicant attorneys fees and costs and any other relief the Board deems appropriate.

Dated:

Respectfully submitted,

Charu Narang, Esq.
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