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

Proceeding	91168324
Party	Defendant ACI International ACI International 844 Moraga Drive Los Angeles, CA 90049
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Date	03/07/2006
Attachments	53221-020000.pdf (4 pages)

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

Z-TECH, INC.)	Opposition No.: 91168324
)	Mark: SPRING Z
Opposer,)	Serial No.: 78/529,121
)	
v.)	
)	ANSWER TO NOTICE OF
ACI INTERNATIONAL,)	OPPOSITION
)	
Applicant.)	
)	

For its answer to the Notice of Opposition of Z-Tech, Inc. (“Opposer”), ACI International (“Applicant”), admits, denies and alleges as follows:

1. Admitted.
2. Admitted.
3. Applicant has not specific knowledge relating to ownership of any registrations or applications relating to the mark Z-Coil and therefore denies the same.
4. Applicant admits that the PTO website indicates that Opposer is the owner of the registered marks referred to in paragraph 4 of the Notice of Opposition, but has no knowledge regarding any change in ownership of these marks and therefore denies the same.
5. Applicant has no knowledge as to ownership of the websites mentioned in paragraph 5 of the Notice of Opposition, and therefore denies the same.
6. Applicant admits that the PTO website indicates that Opposer is the applicant in Application Serial No. 76/626,083, but has no information as to the truth of such ownership and therefore denies the same.

7. Applicant has no specific information as to the owner of Registration No. 002088417, and such non-US ownership is irrelevant to this proceeding, and thereby denies the same.

8. Applicant has no specific information as to the owner of Application No. 4,126,041, and such non-US ownership is irrelevant to this proceeding, and thereby denies the same.

9. Applicant has no specific information as to the owner of Registration Nos. 871,239 and 872,409, and such non-US ownership is irrelevant to this proceeding, and thereby denies the same.

10. Applicant has no specific information as to the owner of Application Nos. 1,238,308 and 1,238,309, and such non-US ownership is irrelevant to this proceeding, and thereby denies the same.

11. Denied.

12. Denied.

13. Denied; applicant has no such design mark.

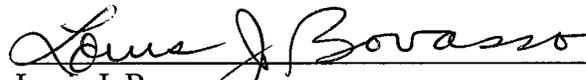
14. Denied.

15. Admitted that, if Applicant is granted registration of its Spring Z mark, it would obtain at least a prima facie exclusive right to use of the mark, but denies that such would be a source of damage and injury to Opposer.

WHEREFORE, Applicant respectfully prays the Opposition be denied and that its Application Serial No. 78/529,121 proceed to registration.

Dated: March 7, 2006

Respectfully submitted,



Louis J. Bovasso
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Attorney for ACI International

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document entitled ANSWER TO NOTICE OF OPPOSITION is being served on Opposer via first class mail, with pre-paid postage thereon, on March 7, 2006, at the following address:

Ray R. Regan, Esq.
LAW OFFICE OF RAY R. REGAN, P.A.
Post Office Box 1442
Corrales, New Mexico 87048

Dated: March 7, 2006



Kelly Simpson

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