

ESTTA Tracking number: **ESTTA367867**

Filing date: **09/13/2010**

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

Proceeding	91195948
Party	Defendant LIFUNG TRINITY MANAGEMENT (SINGAPORE) PTE. LTD.E. LTD.
Correspondence Address	STEVEN M. RABIN RABIN & BERDO, P.C. 1101 14TH ST NW STE 500 WASHINGTON, DC 20005-5633 firm@rabinberdo.com
Submission	Answer
Filer's Name	M. Scott Alprin
Filer's e-mail	firm@rabinberdo.com
Signature	/M. Scott Alprin/
Date	09/13/2010
Attachments	Union Harbour v. Lifung Trinity Management - Answer.pdf (3 pages)(21997 bytes)

9. Applicant lacks sufficient knowledge and information upon which to form a belief as to the truth of the allegations contained in Paragraph 9, and therefore denies the same.
10. Applicant admits the allegations in Paragraph 10.
11. Applicant denies the allegations in Paragraph 11.
12. Applicant admits the allegations in Paragraph 12.
13. Applicant admits the allegations in Paragraph 13.
14. Applicant lacks sufficient knowledge and information upon which to form a belief as to the truth of the allegations contained in Paragraph 14, and therefore denies the same.
15. Applicant denies the allegations in Paragraph 15.
16. Opposer repeated and reasserted its allegations in this paragraph. Applicant likewise repeats and reasserts its above responses.
17. Applicant lacks sufficient knowledge and information upon which to form a belief as to the truth of the allegations contained in Paragraph 17, and therefore denies the same.
18. Applicant denies the allegations in Paragraph 18.
19. Applicant denies the allegations in Paragraph 19.
20. Applicant denies the allegations in Paragraph 20.
21. Applicant denies the allegations in Paragraph 21.
22. Opposer repeated and reasserted its allegations in this paragraph. Applicant likewise repeats and reasserts its above responses.
23. Applicant denies the allegations in Paragraph 23.
24. Applicant denies the allegations in Paragraph 24.
25. Applicant denies the allegations in Paragraph 25.

WHEREFORE, Applicant denies the allegations in the final paragraph of the Notice of Opposition, and respectfully prays that Judgment be entered for Applicant and against Opposer in this proceeding, that the Opposition be dismissed, and that Applicant's mark be allowed to advance to registration on the Principal Register.

Registrant will assert any affirmative defense or compulsory or permissive counterclaim that may be developed throughout discovery and testimony periods in this proceeding.

Respectfully submitted,

LIFUNG TRINITY MANAGEMENT
(SINGAPORE) PTE. LTD.

Date: September 13, 2010

/M. Scott Alprin/
Steven M. Rabin
M. Scott Alprin
Attorneys for Applicant
RABIN & BERDO, P.C.
Suite 500, 1101 14th Street, NW
Washington, D.C. 20005
Tel: (202) 371-8976
Fax: (202) 408-0924

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **Answer** has been served on Opposer by depositing said copy in the mail on September 13, 2010 via pre-paid First Class Mail, addressed to:

JOSEPH T. KUCALA, JR. NORVELL IP LLC
1776 Ash Street
Northfield, IL 60093
UNITED STATES

/Kenny Lai Cheong/
Kenny Lai Cheong