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Filing date: **08/18/2011**

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

Proceeding	91200153
Party	Plaintiff Universal International Music B.V.
Correspondence Address	BRENT S LABARGE C/O UNIVERSAL MUSIC GROUP 2220 COLORADO AVENUE SANTA MONICA, CA 90404 UNITED STATES brent.labarge@umusic.com, deanne.ozaki@umusic.com, nicole.villacorta@umusic.com
Submission	Answer to Counterclaim
Filer's Name	Brent S. LaBarge
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Signature	/Brent S. LaBarge/
Date	08/18/2011
Attachments	Answer to Counterclaim.pdf (3 pages)(12074 bytes)

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

In the matter of Application Serial No. 85/069,828
Mark: MANGO’S TROPICAL CAFE & Design

UNIVERSAL INTERNATIONAL MUSIC B.V.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91200153
)	
MANGO’S TROPICAL CAFE, INC.)	
)	
Applicant.)	
)	

OPPOSER’S ANSWER TO APPLICANT’S COUNTERCLAIM

Opposer Universal International Music B.V. (“Opposer”) hereby responds to Applicant Mango’s Tropical Cafe, Inc.’s (“Applicant”) counterclaim asserted in the above-captioned proceeding on July 18, 2011 as follows:

The preamble to the counterclaim contains only declarative statements to which no response is required. To the extent that any response is required, Opposer denies any allegations in the preamble to the counterclaim.

With regard to the numbered paragraphs of the counterclaim, Opposer states as follows:

1. Opposer admits that it has asserted ownership of Registration No. 1,200,278 for MANGO and Registration No. 1,749,894 for MANGO and Design—in addition to its common law rights—as a basis for opposing registration of Applicant’s MANGO’S TROPICAL CAFE application, U.S. Application Serial No. 85/069,828. Opposer denies the remaining allegations in Paragraph 1.

2. Opposer denies the allegations in Paragraph 2.

3. Opposer lacks sufficient knowledge and information to form a belief as to the truth of the allegations in Paragraph 3 and therefore denies the same.

The “WHEREFORE” clause of the counterclaim is a Prayer for Relief that requires no response. To the extent that any such response is required, Opposer denies that Applicant is entitled to any of the relief requested therein.

All allegations not specifically admitted above are hereby denied.

Dated: August 18, 2011

Respectfully submitted,

UNIVERSAL INTERNATIONAL MUSIC B.V.

By: /Brent S. LaBarge/

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*Attorneys for Opposer Universal International
Music B.V.*

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Opposer's Answer To Applicant's Counterclaim has been served on Applicant by mailing said copy on August 18, 2011, via First Class Mail, postage prepaid, to:

David K. Friedland
Friedland Vining, P.A.
7301 SW 57 Court, Suite 515
South Miami, Florida 33143

/Brent S. LaBarge/

Brent S. LaBarge