

ESTTA Tracking number: **ESTTA469463**

Filing date: **04/26/2012**

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

Proceeding	91203920
Party	Defendant EQUUS WORLD, INC.
Correspondence Address	JAMES ZIETY BORDA & LORENZ P.C. SUITE 370 39555 ORCHARD HILL PLACE NOVI, MI 48375 inventacapital@gmail.com
Submission	Answer
Filer's Name	Michael Shariff
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Date	04/26/2012
Attachments	77676136 (Innova).pdf (4 pages)(82366 bytes)

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

Innova Electronics Corporation)	
)	Mark: MR-EQUUS & Design
Opposer,)	
)	Opposition No. 91203920
)	
v.)	Serial No. 77/676,136
)	
Equus World, Inc.)	Classes 12, 35 & 41
)	
Applicant.	/	

ANSWER TO NOTICE OF OPPOSITION

Applicant, by and through its attorneys identified below, for its Answer to the Notice of Opposition, states as follows:

With respect to the first unnumbered paragraph of the Notice of Opposition, Applicant denies that Opposer will be damaged by registration of the mark in Application Serial No. 77/676,136. With regard to the remaining allegations of the first unnumbered paragraph, Applicant has insufficient knowledge to be able to admit or deny such allegations and therefore neither admits nor denies such allegations.

1. Applicant admits that the USPTO records indicate that Opposer is the current owner of record of Registration No. 3134023 for the mark IEQUUS, and that such mark was registered on August 22, 2006.

2. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

3. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

4. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

5. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

6. Applicant admits Application Serial No. 77/676,136 was filed on February 23, 2009 and covers “automobiles” in Class 12, “import and export agency services in the field of automobiles; retail store services and online retail store services featuring automobiles” in Class 35 and “services of organization of sports events, namely, automobile events, motor races and rallies; services of providing entertainment and sporting event information in the field of automobile events, motor races and rallies; services of a social club, namely, providing information to the members about entertainment and sport automobile events; editing of magazines and other written printed matter and publishing of magazines, for members of a club; social club services, namely, organizing and arranging of social events and activities for members of a club” in Class 41. Applicant admits that Application Serial No. 77/676,136 was published in the *Official Gazette* on February 14, 2012.

7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the statement in paragraph 7, and on that basis denies the same.

8. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the statement in paragraph 8, and on that basis denies the same.

9. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the statement in paragraph 9, and on that basis denies the same.

10. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

11. Applicant lacks sufficient information to admit or deny the allegations, and therefore neither admits nor denies such allegations.

12. Applicant denies the allegations of paragraph 12.

13. Applicant denies the allegations of paragraph 13.

14. Applicant denies the allegations of paragraph 14.

AFFIRMATIVE DEFENSES

1. The Notice of Opposition is barred by estoppel.

2. The Notice of Opposition is barred by waiver.

3. The Notice of Opposition is barred by laches.

4. The Notice of Opposition is barred by acquiescence.

Accordingly, Applicant requests that the Notice of Opposition be dismissed and that Application No. 77/676,136 be allowed.

Respectfully submitted,

Date: April 26, 2012

By:



Michael Shariff, Esq.
Inventa Capital PLC
1010 Parkway Trail, Suite 2
Bloomfield Hills, MI 48302-1460

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer to Notice of Opposition has been served on Opposer's counsel by mailing said copy on April 26, 2012 via First Class Mail, postage prepaid to:

Bruce B. Brunda
Stetina Brunda Garred & Brucker
75 Enterprise, Suite 250
Aliso Viejo, CA 92656

By:



Michael Shariff, Esq.