

ESTTA Tracking number: **ESTTA473788**

Filing date: **05/22/2012**

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

Proceeding	91204703
Party	Defendant WOOGROUP Soci�t� Anonyme
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Date	05/22/2012
Attachments	2012_05_22 Applicant_s Answer.pdf (8 pages)(52253 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEL BOARD**

WESTERN UNION HOLDINGS, INC.,

Opposer,

v.

WOOGROUP Société Anonyme,

Applicant

Opposition No.: 91204703

Serial No.: 79094410

Mark: WOONEO

Published: December 13, 2011

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant WOOGROUP Société Anonyme (“Applicant”) through its undersigned attorney submits its answer to the Notice of Opposition (“Opposition”) filed by Western Union Holdings, Inc. (“Opposer”) dated April 10, 2012 as follows:

1. Applicant admits that the records of the United States Patent and Trademark Office (“USPTO”) regarding Serial No. 7909441 (the “Application”) describe Applicant as a French Société Anonyme de droit français with an address of 58 Avenue de Wagram, F-75017 Paris, France. To the extent that the allegations of Paragraph 1 of the Opposition are not specifically admitted, they are denied.

2. Applicant admits that the USPTO records regarding the Application identifies the class of goods and services as “[f]inancial and monetary affairs, namely money transfer” in International Class 36. To the extent that the allegations of Paragraph 2 of the Opposition are not specifically admitted, they are denied.

3. Applicant admits that the USPTO records regarding U.S. Trademark Registration No. 3936821 identifies the class of goods and services as “[f]inancial affairs and monetary

affairs, namely money transfer” in International Class 36 and indicate that this trademark was cancelled. Applicant further admits that the USPTO records regarding Serial No. 79080064 identifies the class of goods and services as “financial affairs and monetary affairs, namely, money transfer” in International Class 36 and indicate that this trademark application was the subject of an opposition proceeding. Applicant also admits that the USPTO records regarding Serial No. 79098664 identifies the class of goods and services as “[f]inancial services, namely, banking services, money transfer services, electronic funds transfer services, bill payment services, money order services, credit card services, prepaid card services, gift check services, automatic teller machine services, debit and stored value card services and direct deposit of funds into customer bank accounts; automated clearing house deposit services and on-line auction payment and settlement services” in International Class 36 and indicate that this application was abandoned. To the extent that the allegations of paragraph 3 of the Opposition are not specifically admitted, they are denied.

4. Applicant admits the allegations of paragraph 4 of the Opposition.

5. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 5 of the Opposition and, therefore, denies such allegations.

6. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 5 of the Opposition and, therefore, denies such allegations.

7. Paragraph 7 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent that further response is necessary, Applicant admits that the USPTO records indicate that the registration date of U.S. Trademark Registration No.

3284554 is August 28, 2007 and that the owner of this application was Western Union Holdings, Inc. To the extent that the allegations of paragraph 7 of the Opposition are not specifically admitted, they are denied.

8. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 8 of the Opposition and, therefore, denies such allegations.

9. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 9 of the Opposition and, therefore, denies such allegations.

10. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 10 of the Opposition and, therefore, denies such allegations.

11. Paragraph 11 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent that further response is necessary, applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 11 of the Opposition and, therefore, denies such allegations.

12. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 12 of the Opposition and, therefore, denies such allegations.

13. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 13 of the Opposition and, therefore, denies such allegations.

14. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 14 of the Opposition and, therefore, denies such allegations.

15. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 15 of the Opposition and, therefore, denies such allegations.

16. Paragraph 16 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent that further response is necessary, Applicant denies the allegations of paragraph 16 of the Opposition.

17. Paragraph 17 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent that further response is necessary, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 17 of the Opposition and, therefore, denies such allegations.

18. Paragraph 18 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent that further response is necessary, Applicant denies the allegations of paragraph 18 of the Opposition.

19. Paragraph 19 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 19 of the Opposition.

20. Paragraph 20 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant admits that the WOONEO and WU marks begin with the letter W. Except as specifically admitted, the remaining allegations of paragraph 20 of the Opposition are denied.

21. Paragraph 21 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 21 of the Opposition and, therefore, denies such allegations.

22. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 22 of the Opposition and, therefore, denies such allegations.

23. Paragraph 23 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 23 of the Opposition.

24. Paragraph 24 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 24 of the Opposition.

25. Paragraph 25 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 25 of the Opposition.

26. Applicant denies the allegations of paragraph 26 of the Opposition.

27. Paragraph 27 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 27 of the Opposition.

28. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 28 of the Opposition and, therefore, denies such allegations.

29. Applicant denies the allegations of paragraph 29 of the Opposition.

30. Applicant admits that it offers services through multiple means. To the extent the allegations of paragraph 30 of the Opposition are not specifically admitted, Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 30 of the Opposition and, therefore, denies such allegations.

31. Paragraph 31 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 31 of the Opposition.

32. Paragraph 32 of the Opposition states the legal conclusions of the Opposer, to which no answer is required. To the extent further response is necessary, Applicant denies the allegations of paragraph 32 of the Opposition.

33. Applicant lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations of paragraph 33 of the Opposition and, therefore, denies such allegations.

34. Applicant denies the allegations of paragraph 34 of the Opposition.

35. Applicant denies the allegations of paragraph 35 of the Opposition.

36. Applicant denies the allegations of paragraph 36 of the Opposition.

37. Applicant denies the allegations of paragraph 37 of the Opposition.

38. Applicant denies the allegations of paragraph 38 of the Opposition.

39. Applicant denies the allegations of paragraph 39 of the Opposition.

40. Applicant denies the allegations of paragraph 40 of the Opposition.

41. Applicant denies the allegations of paragraph 41 of the Opposition.

42. Applicant denies the allegations of paragraph 42 of the Opposition.

AFFIRMATIVE DEFENSES

1. Opposer has failed to state a claim upon which relief can be granted.

WHEREFORE, Applicant requests that the opposition be dismissed and that Serial No. 79094410 be allowed to register.

Date May 22, 2012

Respectfully submitted,

/s/ Lynn M. Terrebonne

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CERTIFICATE OF SERVICE

I certify that on the 22nd day of May 2012, a true copy of the foregoing **Applicant's Answer to Notice of Opposition** is being served by email and mailing a copy thereof by certified mail addressed to the following individuals, identified in the Notice of Opposition as the attorneys of record and correspondents.

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