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

Proceeding	91211672
Party	Defendant WCMMA Productions, LLC
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Submission	Answer
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Date	08/30/2013
Attachments	Answer-to-Opposition-WCMMA Prod-91211672.pdf(105001 bytes)

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

Federation Internationale de Football Association (FIFA))	
)	
Opposer,)	
)	
v.)	Opposition No.: 91211672
)	
WCMMA Productions, LLC)	
)	
Application Serial No. 85529590)	
WCMMA WORLD CUP OF MIXED MARTIAL ARTS)	
)	
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

COMES NOW the Applicant, WCMMA Productions, LLC to Answer the Notice of Opposition. Any allegation not specifically admitted herein is denied. Applicant specifically denies any confusing similarity or damage to Opposer.

The numbered allegations are answered as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 1.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 2.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 3.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 4.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 5.
6. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 6.
7. Applicant admits the allegations contained paragraph 7.
8. Applicant admits the allegations contained paragraph 8.
9. Applicant admits the allegations contained paragraph 9.
10. Applicant admits the allegations contained paragraph 10.
11. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 11.
12. Applicant is without knowledge or information sufficient to form a belief as to the truth of Opposer's averments in paragraph 12.
13. Applicant denies the allegations contained paragraph 13.
14. Applicant denies the allegations contained paragraph 14.
15. Applicant denies the allegations contained paragraph 15.
16. Applicant denies the allegations contained paragraph 16.
17. Applicant denies the allegations contained paragraph 17.
18. Applicant denies the allegations contained paragraph 18.
19. Applicant denies the allegations contained paragraph 19.

AFFIRMATIVE DEFENSES

1. Applicant asserts that there is no likelihood of confusion, mistake or deception because, inter alia, Applicant's mark and the pleaded marks of Opposer are not confusingly similar.
2. The Notice of Opposition fails to state a claim upon which relief can be granted.
3. Applicant alleges that its use of its mark will not falsely suggest a connection between Applicant and Opposer.
4. Applicant alleges that by Opposer's conduct and omissions, it is equitably estopped to assert any claim for relief against Applicant with respect to the matters that are the subject of the Notice of Opposition.
5. Applicant alleges that by Opposer's conduct and omissions, it has waived, relinquished and or abandoned any claim for relief against Applicant with respect to the matters that are the subject of the Notice of Opposition.
6. Applicant alleges that Opposer has failed to adequately maintain, police or enforce any trademark or proprietary rights in may once have had in its pleaded marks.
7. Opposer does not have the exclusive right to use the term "WORLD CUP" because the primary significance of the term is an indication of the nature or class of the product or service provided by Opposer and is not an indicator of source. The term was in common use in the English language well before Opposer began using the term in connection with its services. The term is used generically by many members of the public and by a wide variety of organizations.
8. Opposer's opposition should be denied under the equitable doctrine of unclean hands.

Opposer has engaged in trademark misuse and trademark bullying by abusively using oppositions, litigation, and threats of the same to maintain a competitive market advantage.

WHEREFORE, Applicant WCMMA Productions, LLC prays that this Notice of Opposition be dismissed.

Dated: August 30, 2013

Respectfully submitted,

WCMMA Productions, LLC

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the Opposer's Attornies of Record by mailing say copy on August 30, 2013, via first class mail, postage prepaid, and by transmission via email to eastdocket@holleymenker.com, dsmith@holleymenker.com, jmenker@holleymenker.com:

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