

ESTTA Tracking number: **ESTTA603325**

Filing date: **05/08/2014**

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

Proceeding	91214902
Party	Defendant Rovio Entertainment Ltd
Correspondence Address	CHRISTINE B REDFIELD K&L GATES LLP 630 HANSEN WAY PALO ALTO, CA 94304-1022 UNITED STATES pltrademarks@klgates.com, TTABlitigationdocket@klgates.com
Submission	Answer
Filer's Name	Whitney J. Baran
Filer's e-mail	whitney.baran@klgates.com
Signature	/Whitney J. Baran/
Date	05/08/2014
Attachments	2014-05-08 ANSWER Filed.pdf(23046 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of U.S. Trademark Application Serial No.: 85/689,262

Published in the *Official Gazette* on October 15, 2013

Mark: ANGRY

CSN-IP, LLC)	
	Opposer,)
)	OPPOSITION NO. 91214902
v.)	
)	
ROVIO ENTERTAINMENT, LTD)	
	Applicant.)

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant Rovio Entertainment, Ltd. (“Rovio”), by and through its counsel, responds as follows to Opposer’s Notice of Opposition in Proceeding No. 91214902. All allegations not specifically admitted are denied.

1. Applicant admits that the U.S. Patent and Trademark Office records indicate that it filed a U.S. Federal trademark application for ANGRY under U.S. Serial No. 85/689,262 for the goods and services listed in that application.

2. Rovio admits that the filing basis for U.S. Application Serial No. 85/689,262 was Section 1(b) and Section 44(e).

3. Rovio admits that it has not filed a Statement of Use or Amendment to Allege Use in Application Serial No. 85/689,262 and that it has not been required to file either document.

4. Rovio admits that CSN-IP is the owner of U.S. Application Serial No. 85/697,715 for ANGRY VOTERS in International Class 041 for “Entertainment services, namely, providing a website featuring games and puzzles; Entertainment services, namely, providing an on-line computer game” and U.S. Application Serial No. 85/697,711 for ANGRY VOTERS in International Class 009 for “Downloadable computer game programs; Interactive video game programs.”

5. Rovio admits that opposition proceedings are currently pending between Rovio and CSN-IP regarding U.S. Applications Serial Nos. 85/697,715 and 85/697,711 and that Rovio has made allegations in those proceedings regarding U.S. Application Serial No. 85/689,262. The Notices of Oppositions in those matters speak for themselves.

6. This paragraph contains a legal conclusion and therefore does not require a response.

7. This paragraph contains a legal conclusion and therefore does not require a response.

8. CSN-IP's Notice of Opposition does not contain an Exhibit A and Rovio is unable to answer allegations regarding that Exhibit. Rovio denies that USPTO search results list twenty-six TTAB proceedings in which applicants have applied to register a mark including the word "angry" for their goods and/or services and in which Rovio has asserted U.S. Application Serial No. 85/689,262. Rovio further notes that several of the purported search results referenced by CSN-IP are for the same applicant(s).

9. Denied.

10. Denied.

11. Denied. Rovio's objections to CSN-IP's discovery requests in separate proceedings speak for themselves.

12. Denied.

13. Denied.

14. Denied.

FIRST GROUND FOR OPPOSITION

15. Denied.

16. Denied.

17. Denied.

SECOND GROUND FOR OPPOSITION

18. Rovio admits that the filing basis for U.S. Application Serial No. 85/689,262 was Section 1(b) and Section 44(e).

Fax: 509.456.0146
Attorneys for Opposer
Rovio Entertainment, Ltd.

