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

Proceeding	91214990
Party	Defendant TAX DISCHARGE DETERMINATOR.COM, LLC
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Submission	Answer
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Date	03/31/2014
Attachments	Tax Discharge Determinator-Opposition Answer.pdf(14895 bytes)

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

**Rubik’s Brand Limited,
Opposer,**

v.

**Tax Discharge Determinator.com, LLC,
Applicant.**

Opposition No. 91214990

**Mark: Geometric Cube (design only
mark)**

Serial No. 85/931,591

Publication Date: October 22, 2013

APPLICANT’S ANSWER TO OPPOSITION

Tax Discharge Determinator.com, LLC (“Applicant”) hereby answers the Notice of Opposition (“Opposition”) filed by Rubik’s Brand Limited (“Opposer”), which opposes Applicant’s registration of the Geometric Cube design mark, Serial No. 85931591, in connection with goods and services “[p]roviding a website featuring on-line non-downloadable software that enables users to determine tax discharge dates in federal bankruptcy law” in International Class 042.

1. Answering the numbered Paragraph 1 of the Opposition, Applicant denies Opposer’s mark is famous. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in the remainder of this paragraph and, therefore, denies such allegations.

2. Answering the numbered Paragraph 2 of the Opposition, Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in this paragraph and, therefore, denies such allegations.

3. Answering the numbered Paragraph 3 of the Opposition, Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in this paragraph and, therefore denies such allegations.

4. Answering the numbered Paragraph 4 of the Opposition, Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in this paragraph and, therefore denies such allegations.

5. Answering the numbered Paragraph 5 of the Opposition, Applicant admits copies of Opposer's federal registration certificates were attached as Exhibit 1. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained within the remainder of this paragraph and, therefore, denies such allegations.

6. Answering the numbered Paragraph 6 of the Opposition, Applicant denies the allegations contained therein.

7. Answering the numbered Paragraph 7 of the Opposition, Applicant denies Opposer's mark is famous. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in the remainder of this paragraph and, therefore, denies such allegations.

8. Answering the numbered Paragraph 8 of the Opposition, Applicant admits it filed an application to register the Opposed Mark on May 14, 2013. Applicant admits the identification of services in the application reads, "providing a website featuring on-line non-downloadable software that enables users to determine tax discharge dates in

federal bankruptcy law” in Class 042. Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in the remainder of this paragraph and, therefore, denies such allegations.

9. Answering the numbered Paragraph 9 of the Opposition, Applicant denies all the allegations contained therein.

10. Answering the numbered Paragraph 10 of the Opposition, Applicant denies all the allegations contained therein.

11. Answering the numbered Paragraph 11 of the Opposition, Applicant denies all the allegations contained therein.

12. Answering the numbered Paragraph 12 of the Opposition, Applicant denies all the allegations contained therein.

WHEREFORE, Applicant respectfully requests that the Opposition be dismissed with prejudice and that Applicant’s Geometric Cube (design only mark) be deemed in condition to be registered.

Respectfully submitted,

Dated: March 31, 2014

s/Nathan P. Suedmeyer
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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2014, a true and complete copy of the foregoing **Applicant's Answer to Opposition** has been served on Nicholas G. de la Torre, Attorney for Opposer, via email to officeactions@brinksgilson.com and First Class Priority Mail, postage prepaid to:

Nicholas G. de la Torre
Brinks Gilson & Lione
P.O. Box 10395
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