

ESTTA Tracking number: **ESTTA602579**

Filing date: **05/06/2014**

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

Proceeding	91215734
Party	Defendant The Solution Group Corp.
Correspondence Address	JESUS SANCHELIMA SANCHELIMA & ASSOCIATES PA 235 SW LE JEUNE RD MIAMI, FL 33134 UNITED STATES
Submission	Answer
Filer's Name	Jesus Sanchelima
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Date	05/06/2014
Attachments	140506le. Answer_CASSA(Final).pdf(102922 bytes )

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

**Assa Realty, LLC**

Opposer,

v.

**Opposition No. 91215734**

**The Solution Group Corp.**

Applicant,

\_\_\_\_\_)

**ANSWER**

Applicant, The Solution Group Corp., a Florida corporation, with its principal place of business at 4100 N. Miami Avenue, Miami, Florida 33127, (hereinafter “Applicant”), owner of the “CASSA” mark and the application serial No. 85/900,657 for its Answer to Petitioner’s Notice of Opposition (hereinafter “Notice”), states and alleges as follows:

1. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 1 of the Notice, and thereby denies the allegations in paragraph 1.
2. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 2 of the Notice, and thereby denies the allegations in paragraph 2.
3. Applicant admits to the assertions in paragraph 3 of the Notice.

4. Applicant admits that the application was filed alleging use but Applicant is without sufficient knowledge to admit or deny the truth of the rest of the allegations in paragraph 4.
5. Applicant admits to the assertions in paragraph 5 of the Notice.
6. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 6 of the Notice, and thereby denies the allegations of paragraph 6.
7. Applicant does not have sufficient knowledge or information to form a belief about the truth of the assertions in paragraph 7 of the Notice as to what meaning Opposer attributes to the mark, and thereby denies the allegations of paragraph 7.
8. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 8 of the Notice, and thereby denies the allegations of paragraph 8.
9. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 9 of the Notice, and thereby denies the allegations of paragraph 9.
10. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 10 of the Notice, and thereby denies the allegations of paragraph 10.
11. No consent is needed. Applicant admits that it never asks Opposer for consent and in fact did not know of its existence.
12. Applicant denies the assertions in paragraph 12.

13. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 13 of the Notice, and thereby denies the allegations of paragraph 13.
14. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 14 of the Notice, and thereby denies the allegations of paragraph 14.
15. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 15 of the Notice, and thereby denies the allegations of paragraph 15.
16. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 16 of the Notice, and thereby denies the allegations of paragraph 16.
17. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 17 of the Notice, and thereby denies the allegations of paragraph 17.
18. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 18 of the Notice, and thereby denies the allegations of paragraph 18.
19. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 19 of the Notice, and thereby denies the allegations of paragraph 19.
20. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 20.

21. Applicant denies the assertions in paragraph 21.
22. Applicant denies the assertions in paragraph 22.
23. Applicant denies the assertions in paragraph 23.
24. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 24.
25. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 25.
26. Applicant denies that the marks are the names of an individual, no need to obtain consent from Opposer.
27. Applicant denies the assertions in paragraph 27.
28. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 28 of the Notice, and thereby denies paragraph 28.
29. Applicant denies the assertions in paragraph 29.
30. Applicant denies the assertions in paragraph 30.
31. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 31 of the Notice, and thereby denies paragraph 31.

32. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 32 of the Notice, and thereby denies the allegations of paragraph 32.

33. Applicant denies the assertions in paragraph 33.

Any allegation of the Notice of Opposition that is not admitted herein is expressly denied. Applicant denies that the Opposer is entitled to the relief sought in the Notice of Opposition.

THEREFORE, the Applicant respectfully requests that the Notice of Opposition be dismissed.

Dated: May 6, 2014

Respectfully submitted,

/s/ Jesus Sanchelima

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically on this 6th day of May 2014 to:

/s/ Jesus Sanchelima  
Jesus Sanchelima, Esq.

**SERVICE LIST**

**Assa Realty, LLC versus The Solution Group Corp**

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