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

Proceeding	91217589
Party	Defendant J & N Sales, LLC
Correspondence Address	JAMES A POWER JR POWER DEL VALLE LLP 233 W 72ND ST NEW YORK, NY 10023-2788 UNITED STATES jp@powerdel.com, james_power@verizon.net
Submission	Answer
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Date	09/05/2014
Attachments	Answer.pdf(37140 bytes )

UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD

_____	)	
RHYTHM HOLDING LIMITED,	)	Opposition No. 91-217589
	)	
Opposer,	)	
	)	In the Matter of:
v.	)	
	)	Application No. 86/050,581
J & N SALES, LLC,	)	
	)	Mark: RHYTHM IN BLUES
Applicant.	)	
_____	)	

Attorney Ref. 256.612

**ANSWER**

Applicant J & N Sales, LLC alleges the following in answer to the Notice of Opposition and as its counterclaims in these proceedings.

1. Applicant is without sufficient knowledge to admit or deny the allegations of paragraph 1 of the Notice of Opposition and therefore denies them.
2. Applicant is without sufficient knowledge to admit or deny the allegations of paragraph 2 of the Notice of Opposition and therefore denies them.
3. Applicant is without sufficient knowledge to admit or deny the allegations of paragraph 3 of the Notice of Opposition and therefore denies them.
4. Applicant is without sufficient knowledge to admit or deny the allegations of paragraph 4 of the Notice of Opposition and therefore denies them.
5. Applicant admits the allegations of paragraph 5 of the Notice of Opposition.
6. Applicant denies the allegations of paragraph 6 of the Notice of Opposition.

WHEREFORE, applicant prays that this opposition be dismissed with prejudice and that applicant be granted such other and further relief as this Board deems just and proper.

J & N SALES LLC

New York, New York  
September 5, 2014

By: /jpower/  
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Certificate of Service

I hereby certify that, on September 5, 2014, a copy of the foregoing Answer was served upon opposer's attorney of record by first class mail, postage prepaid, in an envelope addressed to:

William E. Maguire, Esq.  
520 Broadway, Suite 350  
Santa Monica, California 90401

/jpower/  
James A. Power Jr