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Filing date: **11/03/2014**

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

Proceeding	91218482
Party	Defendant Radlovic, Michael, Birenbaum, Nancy
Correspondence Address	MATTHEW H. SWYERS THE TRADEMARK COMPANY 344 MAPLE AVE W PMB 151 VIENNA, VA 22180-5612 info@thetrademarkcompany.com
Submission	Answer
Filer's Name	Matthew H. Swyers
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Signature	/Matthew H. Swyers/
Date	11/03/2014
Attachments	Answer.pdf(160297 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Serial No. 85/923,810
For the mark UNIVERSAL PAYMENT PROCESSING

Citigroup Inc.,	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91218482
	:	
Nancy Birenbaum & Michael Radlovic,	:	
	:	
Applicants.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW Applicants, Nancy Birenbaum and Michael Radlovic (hereinafter “Applicants”), by and through counsel, The Trademark Company, PLLC, and files their Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

Applicants deny the allegations set forth in the Introductory Paragraph of the Notice of Opposition and demand strict proof thereof. In response to the specifically enumerated paragraphs, the Applicant states as follows:

1. Applicants deny the allegations set forth in Paragraph 1 of the Notice of Opposition as phrased and demand strict proof thereof.
2. Applicants admit the allegations set forth in Paragraph 2 of the Notice of Opposition.
3. Applicants admit the allegations set forth in Paragraph 3 of the Notice of Opposition.

4. Applicants deny the allegations set forth in Paragraph 4 of the Notice of Opposition and demand strict proof thereof.

5. Applicants are without knowledge of the allegations set forth in Paragraph 5 of the Notice of Opposition and therefore deny the same.

6. Applicants deny the allegations set forth in Paragraph 6 of the Notice of Opposition and demand strict proof thereof.

7. Applicants deny the allegations set forth in Paragraph 7 of the Notice of Opposition and demand strict proof thereof.

Applicants further deny all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Applicants pray that the Notice of Opposition be dismissed.

Respectfully submitted this 3rd day of October, 2014.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Applicants

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 3rd day of October, 2014
to be served, via first class mail, postage prepaid, upon:

John P. Margiotta
Fross Zelnick Lehrman & Zissu, PC
866 United Nations Plaza
New York, NY 10017

/Matthew H. Swyers/
Matthew H. Swyers