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Filing date: **03/31/2015**

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

|                        |   |
|------------------------|---|
| Proceeding             | 91220700  |
| Party                  | Defendant<br>Nutrition Training Systems LLC dba Muscleology Sports Nutrition  |
| Correspondence Address | CHRISTIAN SANCHELIMA<br>235 SW 42ND AVE<br>MIAMI, FL 33134<br>UNITED STATES<br>chris@sanchelima.com, legalassist@sanchelima.com, tm@sanchelima.com, je-<br>sus@sanchelima.com |
| Submission             | Answer  |
| Filer's Name           | Christian Sanchelima  |
| Filer's e-mail         | chris@sanchelima.com  |
| Signature              | /Christian Sanchelima/  |
| Date                   | 03/31/2015  |
| Attachments            | 150331cs.Answer.Draft1.350228.pdf(88657 bytes )   |

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

**ATLANTIC INDUSTRIES, LLC  
d/b/a HAMMER NUTRITION**

Opposer,

v.

Opposition No. 91220700

**NUTRITION TRAINING SYSTEMS, LLC**

Applicant,

\_\_\_\_\_)

**ANSWER**

Applicant, Nutrition Training Systems, LLC., a Florida limited liability company, with its principal place of business 3901 SW 47 Ave, Suite 409, Davie, Florida 33366, (hereinafter “Applicant”), owner of the “SLEDGEHAMMER” mark and the Application Serial No. 86/065,776, for its Answer to Opposer’s Notice of Opposition (hereinafter “Notice”), states and alleges as follows:

1. Applicant admits to the assertions 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 paragraph 2.
3. Applicant admits to the assertions in paragraph 3.
4. Applicant admits to the assertions in paragraph 4 that the mark HAMMER NUTRITION was registered on February 28, 2006. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 4 as to the use of the mark HAMMER NUTRITION.
5. Applicant admits to the assertions in paragraph 5 that the mark HAMMER GEL was

registered on February 23, 1996. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 5 as to the use of the mark HAMMER GEL.

6. Applicant admits to the assertions in paragraph 6 that the mark HAMMER BAR was registered on January 4, 2006. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 6 as to the use of the mark HAMMER BAR.
7. Applicant admits to the assertions in paragraph 7.
8. Applicant admits to the assertions in paragraph 8.
9. Applicant admits to the assertions in 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 paragraph 10.
11. Applicant denies the assertions in paragraph 11.
12. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 12 of the Notice, and thereby denies 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 paragraph 13.
14. Applicant admits to the assertions in paragraph 14.
15. Applicant denies the assertions in 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 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 paragraph 17.
18. Applicant denies the assertions in paragraph 18.
19. Applicant denies the assertions in paragraph 19.
20. Applicant denies the assertions in paragraph 20.
21. Applicant denies the assertions in paragraph 21.
22. Applicant denies the assertions in paragraph 22.

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: March 31, 2015

Respectfully submitted,

/Chris Sachelima/  
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Attorneys for Applicant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically by mutual agreement on this 31st day of March 2015 to:

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By: /s/ Chris Sanchelima  
Chris Sanchelima