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Filing date: **06/05/2015**

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

Proceeding	91221739
Party	Defendant Maxima IP Holdings I LLC
Correspondence Address	THOMAS MCNIFF 9 UNDERHILL AVE LOCUST VALLEY, NY 11560-1813 thomas.mcniff@gmail.com
Submission	Answer
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Date	06/05/2015
Attachments	par answer.pdf(2497760 bytes)

VIA ELECTRONIC SYSTEM FOR
TRADEMARK TRIALS AND APPEALS
("ESTTA")
DATE OF FILING: JUNE 5, 2015

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

In re: Trademark Application of
Maxima IP Holdings I LLC
Mark: "PARKS AND RECREATION"
Serial No.: 86/411,895
Filed: October 1, 2014
Published in the Official Gazette on
December 30, 2014

NBCUNIVERSAL MEDIA, LLC

Opposer,

v.

MAXIMA IP HOLDINGS I LLC

Applicant.

Opposition No. 91221739

ANSWER TO NOTICE OF OPPOSITION

The following is the Answer of Applicant Maxima IP Holdings I LLC ("Applicant"), owner of Federal Trademark Application Serial No. 86411895 for the mark PARKS AND RECREATION (hereinafter "Applicant's Mark"), by and through Counsel, Thomas McNiff, to the Notice of Opposition filed on April 29, 2015, by

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NBCUniversal Media LLC (hereinafter "NBC" or "Opposer"), and assigned Opposition

No. 91221739.

1. Applicant admits the allegations of paragraph 1.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 2. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 3. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 4. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 5. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
6. Applicant admits to the facts set forth in the first two sentences of paragraph 6, however Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of the remainder of the paragraph and denies the same.
7. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 7. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

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8. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 8. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
9. Applicant admits the allegations of paragraph 9.
10. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 10. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
11. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 11. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
12. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 12. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
13. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 13. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
14. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 14. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
15. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 15. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

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16. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 16. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

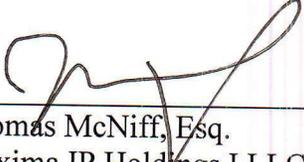
17. Applicant admits the allegations of paragraph 17.

18. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 18. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

WHEREFORE, Applicant respectfully requests that the Notice of Opposition be rejected and that Applicant's Mark be allowed to proceed to registration.

Respectfully Submitted,

By: _____


Thomas McNiff, Esq.
Maxima IP Holdings I LLC
463 Seventh Avenue
New York, NY 10018

Attorney for Applicant

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CERTIFICATE OF TRANSMISSION

I hereby certify that this paper is being electronically filed with the Trademark Trial and Appeal Board of the United States Patent and Trademark Office by means of the Electronic System for Trademark Trials and Appeals ("ESTTA") on this 5th day of June, 2015.

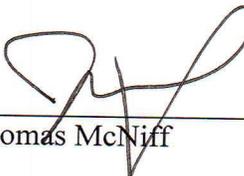

Thomas McNiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this paper was deposited with the United States Postal Service, first class postage prepaid, on the date indicated below, in an envelope addressed to:

Tristram R. Fall, III, Esq.
Fox Rothschild LLP
PO BOX 5231
Princeton, NJ 08543-5231

Dated: June 5, 2015


Thomas McNiff