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

Proceeding	91223940
Party	Plaintiff Express Communications LLC
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Submission	Answer to Counterclaim
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Date	12/02/2015
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No.:	91223940
For the mark:	SAMSUNG XPRESS
Serial No.:	85/799,934
EXPRESS COMMUNICATIONS, LLC,)
)
Opposer,)
v.)
)
SAMSUNG ELECTRONICS CO., LTD.)
)
Applicant.)

ANSWER TO APPLICANT’S COUNTERCLAIMS

Opposer, Express Communications, LLC (hereinafter "Express" or “Opposer”) responds and answers the Counterclaims filed by Applicant Samsung Electronics Co., Ltd. (hereinafter “Samsung” or “Applicant”).

Opposer denies each and every allegation contained in the un-numbered introductory paragraph of Applicant’s Counterlcaims for Cancellation of Opposer’s U.S. Registration Nos. 3937502, 3913116, and 3026855.

1. Opposer lacks sufficient information to either admit or deny the allegations of paragraph 1 of Applicant’s Counterclaims and therefore denies the same.
2. Admitted.
3. Admitted.
4. Admitted.

5. Admitted.
6. Admitted.
7. Opposer lacks sufficient information to either admit or deny the allegations of paragraph 7 of Applicant's Counterclaims and therefore denies the same.
8. Opposer denies each and every allegation contained in Paragraph 8 of Applicant's Counterclaims.
9. Opposer denies each and every allegation contained in Paragraph 9 of Applicant's Counterclaims.
10. Opposer denies each and every allegation contained in Paragraph 10 of Applicant's Counterclaims.
11. Opposer denies each and every allegation contained in Paragraph 11 of Applicant's Counterclaims.
12. Opposer denies each and every allegation contained in Paragraph 12 of Applicant's Counterclaims.
13. Opposer denies each and every allegation contained in Paragraph 13 of Applicant's Counterclaims.
14. Opposer denies each and every allegation contained in Paragraph 14 of Applicant's Counterclaims.
15. Opposer realleges and incorporates its statements in response to Paragraphs 1 – 14 of Applicant's Counterclaims.
16. Opposer denies each and every allegation contained in Paragraph 16 of Applicant's Counterclaims.
17. Opposer denies each and every allegation contained in Paragraph 17 of

Applicant's Counterclaims.

18. Opposer denies each and every allegation contained in Paragraph 18 of Applicant's Counterclaims.

19. Opposer denies each and every allegation contained in Paragraph 19 of Applicant's Counterclaims.

20. Opposer realleges and incorporates its statements in response to Paragraphs 1 – 19 of Applicant's Counterclaims.

21. Opposer denies each and every allegation contained in Paragraph 21 of Applicant's Counterclaims.

22. Opposer denies each and every allegation contained in Paragraph 22 of Applicant's Counterclaims.

23. Opposer denies each and every allegation contained in Paragraph 23 of Applicant's Counterclaims.

24. Opposer denies each and every allegation contained in Paragraph 24 of Applicant's Counterclaims.

25. Opposer realleges and incorporates its statements in response to Paragraphs 1 – 24 of Applicant's Counterclaims.

26. Opposer denies each and every allegation contained in Paragraph 26 of Applicant's Counterclaims.

27. Opposer denies each and every allegation contained in Paragraph 27 of Applicant's Counterclaims.

28. Opposer denies each and every allegation contained in Paragraph 28 of Applicant's Counterclaims.

29. Opposer denies each and every allegation contained in Paragraph 29 of Applicant's Counterclaims.

Affirmative Defense

1. Opposer's Counterclaims fail to state a claim upon which relief may be granted.

Respectfully submitted,



Matthew M. Googe, Reg. No. 66,985
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Certificate of Service

This is to certify that a true and correct copy of the foregoing is being served on Applicant's counsel of record, by email as agreed by the parties, addressed as follows:

Christopher B. Lay
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Date: December 2, 2015


Matthew M. Googe