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

Proceeding	91223971
Party	Defendant Vatche Kiwanian DBA US Batta
Correspondence Address	CURT HANDLEY LAW OFFICE OF CURT HANDLEY 19540 BUCKINGHAM DR SUITE 1 MOKENA, IL 60448 UNITED STATES curt@intuitlaw.com
Submission	Answer
Filer's Name	Curt Handley, Esq.
Filer's e-mail	curt@intuitlaw.com
Signature	/Curt Handley, Esq./
Date	11/02/2015
Attachments	91223971 Answer.pdf(918557 bytes)

Before the:

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Lawrence C. Hinkle II
Fox Rothschild LLP
997 Lenox Dr. Bldg 3
Lawrenceville, NJ 08648
lhinkle@foxrothschild.com

("Plaintiff's Attorney")

USPTO Proceeding #91223971

University City Studios, LLC

v.

Vatche Kiwanian DBA US Batta

Opposed Mark: **Fast & Furious**
Application Serial # 86-479,908

Curt Handley, Esq.
Law Office of Curt Handley
19540 Buckingham Dr.
Mokena, IL 60448
curt@intuitlaw.com

("Defendant's Attorney")

Answer Filed: November 2, 2015

Email and Copy mailed to Plaintiff's Attorney

ANSWER TO NOTICE OF OPPOSITION

Vatche Kiwanian ("Defendant"), an individual residing in California and doing business as US Batta, filed the Opposed Mark pro se on December 14, 2014 on a Section 1(b) basis. On or about June 29, 2015, Defendant's Attorney took over representation of the Opposed Mark. On or about September 23, 2015, Plaintiff's Attorney filed this opposition against the Opposed Mark. Defendant offers its answer to such opposition here.

Defendant responds to Plaintiff's claims in the numbered paragraphs as found in the Plaintiff's Notice of Opposition as follows:

[1] Defendant is without knowledge to confirm or deny this statement.

[2] Defendant affirms this statement.

[3] Defendant affirms this statement.

[4] Defendant is without knowledge to confirm or deny this statement.

[5] Defendant is without knowledge to confirm or deny this statement.

[6] Defendant is without knowledge to confirm or deny this statement.

[7] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[8] Upon review of TARR records, Defendant affirms this statement.

[9] Upon review of TARR records, Defendant affirms this statement.

[10] Defendant is without knowledge to confirm or deny this statement.

[11] Defendant is without knowledge to confirm or deny this statement.

[12] Defendant is without knowledge to confirm or deny this statement.

[13] Defendant is without knowledge to confirm or deny this statement.

[14] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[15] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[16] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[17] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[18] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

[19] Under good faith and belief that Plaintiff does not have exclusive claim to the words, "Fast & Furious", Defendant denies this statement.

Defendant asserts that the stated bases of Plaintiff's claim of opposition are all without merit as will be determined from the facts of the case.

WHEREFORE, Defendant asks that Plaintiff's claim of opposition be denied with prejudice and that the Opposed Mark be allowed to proceed to registration.

This answer has been filed through ETAS and a copy emailed and mailed to Plaintiff's attorney.

Respectfully submitted,

Curt Handley, Esq.

Curt Handley, Esq.

Defendant's Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served on November 2, 2015, via First Class Mail, postage prepaid to Plaintiff's Attorney:

Lawrence C. Hinkle II
Fox Rothschild LLP
997 Lenox Dr. Bldg 3
Lawrenceville, NJ 08648

Curt Handley, Esq.

Dated: 11/2/2015

Curt Handley, Esq.

Defendant's Attorney