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

Proceeding	91225481
Party	Defendant Alfred Inc.
Correspondence Address	MATTHEW H. SWYERS 344 MAPLE AVE W STE 151 VIENNA, VA 22180-5612 mswyers@thetrademarkcompany.com
Submission	Answer
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Date	01/15/2016
Attachments	Answer.pdf(166907 bytes)

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

Serial No. 86/395,092
For the mark **alfred**

Alfred Club, Inc.,	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91225481
	:	
Alfred Inc.,	:	
	:	
Applicant.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW Applicant, Alfred Inc. (hereinafter “Applicant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

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

1. Applicant is without knowledge of the allegations set forth in Paragraph 1 of the Notice of Opposition and therefore denies the same.
2. Applicant denies the allegations set forth in Paragraph 2 of the Notice of Opposition as phrased and demands strict proof thereof.
3. Applicant is without knowledge of the allegations set forth in Paragraph 3 of the Notice of Opposition and therefore denies the same.

4. Applicant denies the allegations set forth in the last sentence of Paragraph 4 of the Notice of Opposition as phrased and demands strict proof thereof; otherwise, Applicant is without knowledge of the allegations set forth in Paragraph 4 of the Notice of Opposition and therefore denies the same.

5. Applicant denies the allegations set forth in Paragraph 5 of the Notice of Opposition as phrased and demands strict proof thereof.

6. Applicant denies the statement “just days after Alfred Club received the TechCrunch Disrupt award” appearing in Paragraph 6 of the Notice of Opposition as phrased and demands strict proof thereof; otherwise, Applicant admits the allegations set forth in Paragraph 6 of the Notice of Opposition.

7. Applicant admits the allegations set forth in Paragraph 7 of the Notice of Opposition.

8. Applicant is without knowledge of the allegations set forth in Paragraph 8 of the Notice of Opposition and therefore denies the same.

9. Applicant is without knowledge of the allegations set forth in the last sentence of Paragraph 9 of the Notice of Opposition and therefore denies the same; otherwise, Applicant admits the allegations set forth in Paragraph 9 of the Notice of Opposition.

10. Applicant hereby incorporates its answers to the allegations contained in Paragraphs 1 – 9 above.

11. Applicant denies the allegations set forth in Paragraph 11 of the Notice of Opposition and demands strict proof thereof.

12. Applicant denies the allegations set forth in Paragraph 12 of the Notice of Opposition and demands strict proof thereof.

13. Applicant denies the allegations set forth in Paragraph 13 of the Notice of Opposition as phrased and demands strict proof thereof.

14. Applicant denies the allegations set forth in Paragraph 14 of the Notice of Opposition and demands strict proof thereof.

15. Applicant denies the allegations set forth in Paragraph 15 of the Notice of Opposition and demands strict proof thereof.

16. Applicant denies the allegations set forth in Paragraph 16 of the Notice of Opposition and demands strict proof thereof.

17. Applicant hereby incorporates its answers to the allegations contained in Paragraphs 1 – 16 above.

18. Applicant denies the allegations set forth in the last sentence of Paragraph 18 of the Notice of Opposition and demands strict proof thereof; otherwise, Applicant denies the allegations set forth in the last sentence of Paragraph 18 of the Notice of Opposition as phrased and demands strict proof thereof.

19. Applicant denies the allegations set forth in Paragraph 19 of the Notice of Opposition and demands strict proof thereof.

20. Applicant denies the allegations set forth in Paragraph 20 of the Notice of Opposition and demands strict proof thereof.

21. Applicant denies the allegations set forth in Paragraph 21 of the Notice of Opposition and demands strict proof thereof.

22. Applicant denies the allegations set forth in Paragraph 22 of the Notice of Opposition and demands strict proof thereof.

23. Applicant denies the allegations set forth in Paragraph 23 of the Notice of Opposition and demands strict proof thereof.

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

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 15th day of January, 2016.

THE TRADEMARK COMPANY, PLLC

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