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

Proceeding	91226930
Party	Defendant Sesi, Joseph
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Submission	Answer
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Date	04/18/2016
Attachments	OPP-ApplicantsAnswer -- 86284735.pdf(119619 bytes)

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

In the matter of: U.S. Serial No. 86284735
Date of filing: May 19, 2014
Mark: ACE OF SPADES GENTLEMENS CLUB
Date of Publication: Jan. 19, 2016

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Ace of Spades Holdings, LLC)	
Opposer,)	Opposition No. 91226930
)	
v.)	Mark: ACE OF SPADES
)	GENTLEMENS CLUB
)	
Joseph Sesi)	Serial No. 86284735
Applicant.)	
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APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant, Joseph Sesi (“Applicant”), for its Answer to the Notice of Opposition filed by Ace of Spades Holdings, LLC against application for registration of Applicant's trademark ACE OF SPADES GENTLEMENS CLUB, Application Serial No. 86/284,735, filed May 19, 2014 and published in the Official Gazette of Jan. 19, 2016, pleads and avers as follows:

1. Admitted.
2. Applicant admits that the USPTO Trademark Status & Document Retrieval database shows Opposer as the owner of Registration Numbers 4516769, 4841135, and 4733892. Applicant is without sufficient knowledge or information to form a belief as to the remainder of the allegations presented in Paragraph 2 and accordingly denies those allegations.
3. Applicant is without sufficient knowledge or information to form a belief as to the allegations

presented in Paragraph 3 and accordingly denies those allegations.

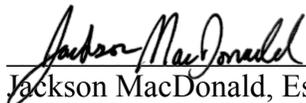
4. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 4 and accordingly denies those allegations.
5. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 5 and accordingly denies those allegations.
6. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 6 and accordingly denies those allegations.
7. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 7 and accordingly denies those allegations.
8. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 8 and accordingly denies those allegations.
9. Applicant is without sufficient knowledge or information to form a belief as to the allegations presented in Paragraph 9 and accordingly denies those allegations.
10. Applicant admits that he filed Application Serial No. 86284735 for the mark ACE OF SPADES GENTLEMENS CLUB, with GENTLEMENS CLUB disclaimed, covering “Adult entertainment services in the nature of adult cabarets featuring topless dancing” in International Class 41. Applicant is without sufficient knowledge or information to form a belief as to the remainder of the allegations presented in Paragraph 10 and accordingly denies those allegations.
11. Applicant admits that Application Serial No. 86284735 covers services in International Class 41. Opposer’s allegation that its ACE OF SPADES mark is famous is a legal conclusion to which no responsive pleading is required; however, to the extent this presents a factual allegation, Applicant denies that Opposer’s ACE OF SPADES mark is famous. Applicant denies the remainder of the allegations presented in Paragraph 11.
12. Denied.

13. Denied.

In view of the foregoing, Applicant contends that this opposition is groundless and baseless in fact; that Opposer has not shown wherein it will be, or is likely to be, damaged by the registration of Applicant's trademark; that Applicant's trademark is manifestly distinct from any alleged mark of the Opposer or any designation of the Opposer and Applicant prays that this Opposition be dismissed and that Applicant be granted registration of its trademark.

Dated: April 18, 2016

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that a copy of this APPLICANT'S ANSWER TO NOTICE OF OPPOSITION, is being deposited with the U.S. Postal Service on April 18, 2016 by first-class mail, postage prepaid to the counsel of record in an envelope addressed as follows:

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