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

Proceeding	91227566
Party	Defendant Clique Media, Inc.
Correspondence Address	Michelle A. Cooke Manatt, Phelps & Phillips, LLP 11355 W. Olympic Blvd. Los Angeles, CA 90064  mcooke@manatt.com;IPDocket@manatt.com
Submission	Answer
Filer's Name	Dax Alvarez
Filer's e-mail	ipladocket@swlaw.com, dalvarez@swlaw.com, jlpeterson@swlaw.com
Signature	/Dax Alvarez/
Date	05/16/2016
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Application Serial No.: 86/464,842  
Published in the Official Gazette on: December 29, 2015

MINED LLC	)	
	)	
Opposer,	)	
	)	
vs.	)	Opposition No.: 91227566
	)	
CLIQUE MEDIA, INC.	)	
	)	
Applicant.	)	
_____	)	

**ANSWER TO NOTICE OF OPPOSITION**

Applicant, Clique Media, Inc., by and through its undersigned attorneys of record,  
answers the Notice of Opposition as follows:

1. In answering the preface of the Notice of Opposition, Applicant denies any and all allegations and inferences that Opposer would be damaged by registration of Applicant's mark.
2. In answering Paragraph 1 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
3. In answering Paragraph 2 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.

4. In answering Paragraph 3 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
5. In answering Paragraph 4 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
6. In answering Paragraph 5 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
7. In answering Paragraph 6 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
8. In answering Paragraph 7 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
9. In answering Paragraph 8 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
10. In answering Paragraph 9 of the Notice of Opposition, Applicant admits same.
11. In answering Paragraph 10 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
12. In answering Paragraph 11 of the Notice of Opposition, Applicant admits same.

13. In answering Paragraph 12 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
14. In answering Paragraph 13 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
15. In answering Paragraph 14 of the Notice of Opposition, Applicant is without sufficient information or knowledge to form a belief about the truthfulness of the allegations contained therein, thus denying same.
16. In answering Paragraph 15 of the Notice of Opposition, Applicant denies same.

**Affirmative Defenses:**

In view of the allegations set forth in the Opposer's Notice of Opposition, as well as the responses and allegations of Applicant set forth below, Applicant sets forth the following affirmative defenses:

- 1) Opposer fails to state a claim by which relief may be granted;
- 2) Opposer does not own rights sufficient to support a claim by which relief may be granted.
- 3) Applicant's use of its mark will not mistakenly be thought by the public to derive from the same source as Opposer's alleged services, nor will such use be thought by the public to be a use by Opposer or with Opposer's authorization or approval.
- 4) Applicant's mark when used on Applicant's goods and services is not likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection or

association of Applicant with Opposer, or as to the origin, sponsorship, or approval of Applicant's goods and services by Opposer.

- 5) Applicant reserves the right to allege other affirmative defenses as they may become known during the course of discovery and hereby specifically reserves the right to amend its Answer to allege said affirmative defenses at such time as they become known.

WHEREFORE, Applicant prays that the Opposition be dismissed that the mark be allowed to mature for registration.

Respectfully submitted,

SNELL & WILMER LLP

Date: May 16, 2016

By: \_\_\_\_\_

Dax Alvarez

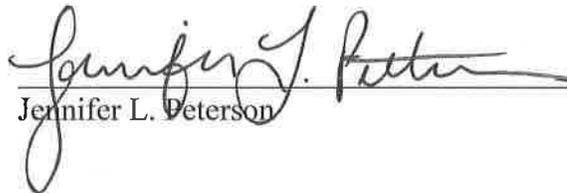
Two California Plaza  
350 South Grand Avenue, Suite 2600  
Los Angeles, CA 90071-3406  
213.929.2500

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing ANSWER TO NOTICE OF OPPOSITION was served by first class mail, postage prepaid, on this 16<sup>th</sup> day of May upon Opposer's attorneys:

Oliver Edwards  
Law Office of Oliver Edwards LLC  
9919 Rogart Road  
Silver Spring, MD 20901  
UNITED STATES

Date: May 16, 2016

  
Jennifer L. Peterson