

ESTTA Tracking number: **ESTTA745927**

Filing date: **05/11/2016**

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

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Club America Soccer Academy, Inc.
Granted to Date of previous extension	05/11/2016
Address	12618 Oak Street Lynwood, CA 90262 UNITED STATES
Party who filed Extension of time to oppose	Club America Soccer Academy, Inc.
Relationship to party who filed Extension of time to oppose	Corrected typo in name (America) and added comma between Academy and Inc.

Attorney information	Kyriacos Tsircou Tsircou Law, P.C. 515 S. Flower Street, 36th Flr. Los Angeles, CA 90071 UNITED STATES kyri@tsircoulaw.com Phone:(323) 660-9916
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Applicant Information

Application No	86617575	Publication date	01/12/2016
Opposition Filing Date	05/11/2016	Opposition Period Ends	05/11/2016
Applicants	Rivera, Albert #208 Pomona, CA 91766 UNITED STATES Oki, Lisa K. #208 Pomona, CA 91766 UNITED STATES		

Goods/Services Affected by Opposition

Class 041. First Use: 2015/02/10 First Use In Commerce: 2015/03/03

All goods and services in the class are opposed, namely: Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments

Applicant Information

Application No	86617631	Publication date	01/12/2016
Opposition Filing Date	05/11/2016	Opposition Period Ends	
Applicants	Rivera, Albert #208 Pomona, CA 91766 UNITED STATES Oki, Lisa K. #208 Pomona, CA 91766 UNITED STATES		

Goods/Services Affected by Opposition

Class 041. First Use: 2015/02/10 First Use In Commerce: 2015/03/03
 All goods and services in the class are opposed, namely: Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments

Applicant Information

Application No	86617587	Publication date	03/08/2016
Opposition Filing Date	05/11/2016	Opposition Period Ends	
Applicants	Rivera, Albert 400 Ferrara Court Pomona, CA 91766 UNITED STATES Oki, Lisa K. 400 Ferrara Court Pomona, CA 91766 UNITED STATES		

Goods/Services Affected by Opposition

Class 041. First Use: 0 First Use In Commerce: 0
 All goods and services in the class are opposed, namely: Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act Section 2(d)
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Marks Cited by Opposer as Basis for Opposition

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	L.A. Salsa Soccer Club		
Goods/Services	Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	L.A. Salsa Futbol Club		
Goods/Services	Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	Los Angeles Salsa Soccer Club		
Goods/Services	Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	Los Angeles Salsa Futbol Club		
Goods/Services	Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments		

Attachments	Notice of Opposition.pdf(298678 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/kyri tsircou/
Name	Kyriacos Tsircou
Date	05/11/2016

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

**CLUB AMERICA SOCCER
ACADEMY INC.**

Opposer,

v.

ALBERT RIVIERA; LISA K. OKI

Applicants.

Opposition No.: Not Yet Assigned

Applicants' Marks:

1) US Serial No. 86617575 ("LA SALSA FUTBOL CLUB")

Date Published: January 12, 2015

2) US Serial No. 86617631 ("LA SALSA FUTBOL CLUB" logo mark)

Date Published: January 12, 2015

3) US Serial No. 86617587 ("L.A. SALSA F.C.")

Date Published: March 8, 2016



NOTICE OF OPPOSITION

Opposer Club America Soccer Academy Inc. ("Opposer"), a corporation duly organized and existing under the laws of California and having a principal place of business at 12618 Oak Street, Lynwood, California 90262, will be damaged by registration of the marks shown in the above-identified applications, and hereby opposes the same.

The grounds for opposition are as follows:

1. Opposer filed a Fictitious Business Name Statement on April 28 2014 for a number of names including, but not limited to: "L.A. Salsa Soccer Club"; "L.A. Salsa Futbol Club"; "Los Angeles Salsa Soccer Club"; "Los Angeles Salsa Futbol Club" (hereinafter "Salsa marks")

2. Opposer has been in continuous use of the “Salsa marks”, in connection with organizing, promoting, and conducting leagues, teams, and athletic competitions in the sport of soccer, at least as early as April 2014.

3. In March 2015 the LA Salsa SC, or LA Salsa Soccer Club, joined the United Premier Soccer League (UPSL), Southern California’s fastest growing professional development league. Through their participation in the UPSL, the LA Salsa SC mark has been used extensively in promotion of the team, solicitation of new players and staff, and associated events and competitions in the sport of soccer.

4. According to the respective applications for Applicants’ marks, the earliest use in commerce date for both marks is March 3, 2015.

5. The records of the USPTO indicate that Applicant is the owner of the following trademark application:

Mark	Appl. Serial No.	Appl. Filing Date	Date of First Use	Goods
LA SALSA FUTBOL CLUB	86/617,575	May 1, 2015	First Use: February 10, 2015 Use in commerce: March 03, 2015	041 - Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments
L.A. SALSA FC	86/617,587	May 1, 2015	1(b) basis	041 - Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments

 <p>LA SALSA FUTBOL CLUB</p>	86/617,631	May 1, 2015	First Use: February 10, 2015 Use in commerce: March 03, 2015	041 - Organizing and conducting athletic competitions and games in the field of soccer; Organizing sporting events, namely, soccer; Organizing, conducting and operating soccer tournaments
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6. Applicant's marks are identical to Opposer's "Salsa marks"

7. The goods and services identified in the opposed application are in International Class 041, and are identical to those goods and services which Opposer's "Salsa marks" are associated.

8. Applicant's use the above marks are unauthorized, as such will cause confusion, or to cause mistake, or to deceive as to the source of the identified goods and services within the meaning of Section 2(d) of the Lanham Act.

WHEREFORE, Applicants' marks are damaging to Opposer, and Opposer has been in use of the "Salsa marks" at least as early as before Applicants' stated use in commerce date, Opposer requests that registration aforesaid applications be denied.

The fee required by §2.6 is enclosed herewith.

Respectfully submitted,
 TSIRCOU LAW, P.C.
 By: /kyri tsircou/
 Kyriacos Tsircou
 Attorney for Opposer
 CLUB AMERICA SOCCER ACADEMY

TSIRCOU LAW, P.C.
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 Los Angeles, California 90071
 Telephone: (323) 660-9916
 Facsimile: (323) 660-9917

CERTIFICATION OF SERVICE

This is to certify that a copy of the foregoing NOTICE OF OPPOSITION has been served on Applicants by email and by depositing said copy with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to:

Joe A. Brock
Patent Venture Group
10788 Civic Center Dr Ste 215
Rancho Cucamonga, California 91730-7618

Email: joe@pvglaw.com

Dated: May 11, 2016

/kyri tsircou/
Kyriacos Tsircou