

ESTTA Tracking number: **ESTTA748591**

Filing date: **05/26/2016**

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

Proceeding	92063564
Party	Defendant Complete Meet, LLC
Correspondence Address	COMPLETE MEET LLC 47 MIDDLESEX DRIVE BRENTWOOD, MO 63144 UNITED STATES jmoore@thecloudboom.com
Submission	Answer
Filer's Name	Bradley R Barton
Filer's e-mail	bradbartonlaw@gmail.com
Signature	/s/ Bradley R Barton
Date	05/26/2016
Attachments	Answer to Petition.pdf(28634 bytes)

II. GENERAL DENIAL

Registrant denies each and every allegation in the petition that is not specifically admitted herein.

III. PRAYER FOR RELIEF

WHEREFORE, Registrant, having fully answered the petition, prays for the following:

- (a) For a final judgment in Registrant's favor that: (i) dismisses with prejudice each and every claim asserted by Petitioner against Registrant in the case; (ii) declares the Registrant to be the prevailing party on Petitioner's claim(s); and (iii) awards Registrant attorney fees and costs to the maximum extent allowed by law.
- (b) For a final judgment that grants Registrant such other and further legal and equitable relief as may be just and proper under the circumstances.

IV. AFFIRMATIVE DEFENSES

As and for a First Defense: Petitioner has failed to state a claim upon which relief can be granted. The petition and each cause of action therein fails to state facts sufficient to constitute a cause of action against the Registrant for which relief can be granted.

As and for a Second Defense: Registrant has not abandoned its service mark and has used, and continues to use, said service mark in commerce.

BARNUM, PENNICK & BARTON, LLC

By: /s/ Bradley R. Barton
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ATTORNEYS FOR REGISTRANT

Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument has been served, via First Class Mail, postage prepaid, and via electronic transmission, on May 26, 2016, to the following individual(s):

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/s/ Bradley R. Barton
Bradley R. Barton
Attorney for Registrant