

TTAB

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: BOX TTAB NO FEE, Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513 on January 13, 2003.

01-16-2003

U.S. Patent & TMO/TM Mail Rcpt Dt. #70

Brian P. O'Donnell

Name of applicant, assignee, or Registered Rep.

Brian O'Donnell
Signature

1/13/2003
Date

Docket No.: 41196-10012

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

MILTON SALES, INC.)
)
Opposer,)
)
v.)
)
UNIVERSAL MANUFACTURING)
COMPANY, INC.)
)
Applicant.)

In re Serial No. 76/335,302
for RACE FOR CASH

Opposition No. 91153705

19 JAN 23 PM 5:07

Box TTAB NO FEE
Assistant Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3513

ANSWER TO AMENDED NOTICE OF OPPOSITION

Applicant hereby answers the amended notice of opposition filed by Milton Sales, Inc. as follows:

1. Applicant denies the allegations contained in the first sentence of paragraph 1. Applicant has insufficient knowledge or information to admit or deny the allegations contained in the second sentence of paragraph 1 and therefore denies the allegations.

2. Applicant has insufficient knowledge or information to admit or deny the allegations contained in paragraph 2 and therefore denies the allegations.

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3. Applicant denies Opposer is the owner of the mark RACING FOR CASH and further denies that Applicant's mark is identical in sound and appearance to the RACING FOR CASH mark. Applicant admits that Applicant's mark is identical in connotation to the RACING FOR CASH mark.

4. Applicant has insufficient knowledge or information to admit or deny the allegations contained in paragraph 4 and therefore denies the allegations.

5. Applicant denies the allegations contained in paragraph 5.

6. Applicant denies the allegations contained in paragraph 6.

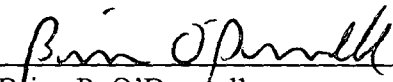
7. Applicant denies the allegations contained in paragraph 7.

WHEREFORE, Applicant, Universal Manufacturing Company, Inc. prays that this opposition be dismissed and that a certificate of registration issue to Applicant for the mark RACE FOR CASH, Application Serial No. 76/335,302.

Respectfully submitted,

UNIVERSAL MANUFACTURING COMPANY, INC..

Dated: January 13, 2003



Brian P. O'Donnell
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Chicago, Illinois 60611
Tel: 312-222-9350

CERTIFICATE OF SERVICE

I, Brian P. O'Donnell, attorney for Applicant, hereby certify that a copy of this ANSWER, which was filed with the TTAB on January 13, 2003, a copy of which is attached, was duly served upon Bruce A. Tassan, Tassan Law Firm, 4143 North 27th Street, Arlington, VA 22207-5211, attorney for Opposer, by First Class Mail, postage prepaid, on January 13, 2003.

A handwritten signature in cursive script, reading "Brian O'Donnell", is written over a horizontal line.

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