



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

Starz Entertainment Group LLC)	
)	
Opposer,)	
)	
v.)	
)	Opposition No. 91163069
China Star Trademark Limited)	
)	
Applicant)	
)	
)	
)	

ANSWER TO NOTICE OF OPPOSITION

Applicant China Star Trademark Limited hereby responds to the allegations in the Notice of Opposition as follows:

1. Applicant lacks sufficient knowledge and information to form a belief as to the allegations in paragraph 1, and therefore denies the same.
2. Applicant admits that the on-line records of the USPTO reflect that Opposer is listed as the owner of U.S. Registration Nos. 2,050,515; 2,651,265; and 2,783,505. Applicant lacks sufficient knowledge and information to form a belief as to the remaining allegations in paragraph 2, and therefore denies the same.
3. Applicant lacks sufficient knowledge and information to form a belief as to the allegations in paragraph 3, and therefore denies the same.
4. Applicant admits that the on-line records of the USPTO list Opposer as the owner of U.S. Application Serial Nos. 76/306,284 and 76/306,283, both of which were filed on an



intent-to-use basis subsequent to Applicant's U.S. Application Serial No. 76/118,110 (CHINASTAR and Design) and therefore have later priority dates than Applicant's U.S. Application Serial No. 76/118,110.

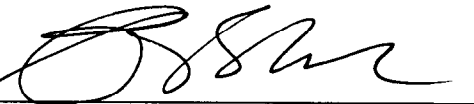
- 5. Applicant denies the allegations in paragraph 5.
- 6. Applicant admits the allegations in paragraph 6.
- 7. Applicant denies the allegations in paragraph 7.
- 8. Applicant denies the allegations in paragraph 8.
- 9. Applicant denies the allegations in paragraph 9.
- 10. Applicant denies the allegations in paragraph 10.
- 11. Applicant denies the allegations in paragraph 11.

AFFIRMATIVE DEFENSES


12. There is no likelihood of confusion because the marks are distinguishable, the parties' goods and services are different, the consumers and trade channels are different, and the consumers of both parties' goods are sophisticated.

Respectfully submitted,

CHINA STAR TRADEMARK LIMITED

By: 

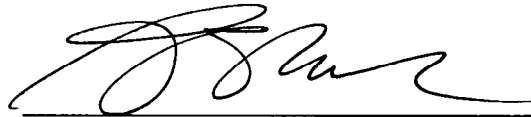
Bassam N. Ibrahim
Bryce J. Maynard
Attorneys for Applicant

Date: 
Burns, Doane, Swecker & Mathis, LLP
1737 King Street
Alexandria, Virginia 22314-2727
Telephone: 703-836-6620

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Respondent's ANSWER TO NOTICE OF OPPOSITION was served this 31st day of May, 2005 by first-class mail, postage prepaid, on:

Leslie H. Smith, Esq.
Liacouras & Smith, LLP
1515 Market Street, 9th Floor
Philadelphia, PA 19102



Bassam N. Ibrahim