ESTTA Tracking number: **ESTTA87915**

Filing date: **06/29/2006**

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

Proceeding	91171390
Party	Defendant World Market Center Venture, LLC World Market Center Venture, LLC 495 S. Grand Central Parkway Las Vegas, NV 89106
Correspondence Address	Andrew D. Sedlock Greenberg Traurig LLP 3773 Howard Hughes Parkway, Suite 500N Las Vegas, NV 89109
Submission	Answer
Filer's Name	Andrew D. Sedlock
Filer's e-mail	sedlockd@gtlaw.com, whiteheads@gtlaw.com, mileskr@gtlaw.com, austinc@gtlaw.com
Signature	/Andrew D. Sedlock/
Date	06/29/2006
Attachments	91171390 Response.PDF (4 pages)(126662 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

World Trade Centers Association, Inc., Opposer, v. World Market Center Venture, LLC, Applicant.	Opposition No. 91171390 Mark: WORLD MARKET CENTER Class: 35, 36, 37 and 43 Serial No. 78/477,289

RESPONSE TO NOTICE OF OPPOSITION

World Market Center Venture, LLC, ("World Market" or "Applicant") hereby answers the Notice of Opposition ("Opposition") filed by World Trade Centers Association, Inc.("World Trade" or "Opposer"), which opposes Applicant's application, Serial No. 78/477,289 for the mark WORLD MARKET CENTER and design.

1. Answering numbered Paragraph 1 of the Opposition, Applicant lacks sufficient information to form a belief as to the truth or falsity of the allegations contained in such paragraphs and, therefore, denies such allegations.

2. Answering numbered Paragraph 2 of the Opposition, Applicant admits Opposer is the owner of Federal Registration No. 1,469,489 and denies all remaining allegations contained therein

3. Answering numbered Paragraph 3 of the Opposition, Applicant admits Opposer is the owner of Federal Registration No. 1,749,086 and denies all remaining allegations contained therein.

4. Answering numbered Paragraph 4 of the Opposition, Applicant admits Opposer is the owner of Federal Registration No. 1,011,720 and denies all remaining allegations contained therein.

5. Answering numbered Paragraph 5 of the Opposition, that paragraph contains statements to which no response is required.

6. Answering numbered Paragraph 6 of the Opposition, Applicant denies the allegations contained therein.

7. Answering numbered Paragraph 7 of the Opposition, Applicant denies the allegations contained therein.

8. Answering numbered Paragraph 8 of the Opposition, Applicant denies the allegations contained therein.

9. Answering numbered Paragraph 9 of the Opposition, Applicant denies the allegations contained therein.

10. Answering numbered Paragraph 10 of the Opposition, Applicant admits that it seeks registration of the mark WORLD MARKET CENTER, and denies all remaining allegations contained therein.

11. Answering numbered Paragraph 11 of the Opposition, Applicant denies the allegations contained therein.

AFFIRMATIVE DEFENSES

1. Applicant repeats, realleges and incorporates herein each and every allegation of the preceding paragraphs as if fully set forth herein.

2. Opposer's Opposition is barred under the doctrine of laches.

3. Opposer's Opposition is barred by the doctrine of estoppel.

4. Opposer's Opposition is barred by the doctrine of waiver.

WHEREFORE, Applicant requests that the Opposition be denied.

DATED: June 29, 2006.

GREENBERG TRAURIG

Mark G. Tratos
Andrew D. Sedlock
F. Christopher Austin
Ronald D. Green
3773 Howard Hughes Parkway
Suite 500 North
Las Vegas, Nevada 89109
Counsel for World Market Center Venture, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2006, I served the foregoing Response to Notice of Opposition on:

Erica D. Klien, Esq.
1177 Avenue of the Americas
New York, New York 10036
Counsel for: Opposer

by causing a full, true, and correct copy thereof to be sent by the following indicated method or methods, on the date set forth below:

☒ by mailing in a sealed, first-class postage-prepaid envelope, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service at Las Vegas, Nevada.

☐ by hand delivery.

☐ by sending via overnight courier in a sealed envelope.

☐ by faxing to the attorney at the fax number that is the last-known fax number.

☐ by electronic mail to the last known e-mail address.

An employee of Greenberg Traurig