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

Proceeding	91172045
Party	Defendant Lightspeed Entertainment, LLC Lightspeed Entertainment, LLC 22328 Harbor Ridge #3 Torrance, CA 90502
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Tabetha D. Plummer
(name of person signing certificate)

Tabetha D. Plummer
(signature)

September 5, 2006
(date of signature)

IN THE

UNITED STATES PATENT AND TRADEMARK OFFICE

TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Trademark Registration Application Serial No. 78/614,307 published in the Official Gazette (Trademarks) on March 28, 2006:

MONSTER CABLE PRODUCTS, INC.	)	
	)	
Opposer,	)	
v.	)	Opposition No.: 91172045
	)	
LIGHTSPEED ENTERTAINMENT, LLC,	)	
	)	
Applicant.	)	
	)	

ANSWER TO NOTICE OF OPPOSITION

Lightspeed Entertainment, LLC, by its attorneys, hereby Answers the Notice of Opposition of Monster Cable Products, Inc. and admits, denies and alleges as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 and on that basis denies the allegations contained therein.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 and on that basis denies the allegations contained therein.

3. Applicant admits that Opposer is listed as the owner of Registration No. 2,184,002 for the trademark MONSTER and that the goods listed in this registration are "electronic and musical signal transmitting cable and connectors." Applicant further admits that this registration identifies a registration date of August 25, 1198. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 3 and on that basis denies the allegations contained therein.

4. Applicant admits that Opposer is listed as the owner of Registration No. 2,197,793 for the trademark MONSTER and that the goods listed in this registration are "newsletters, magazines, catalogs and newspapers providing entertainment industry cable industry news." Applicant further admits that this registration identifies a registration date of October 20, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 4 and on that basis denies the allegations contained therein.

5. Applicant admits that Opposer is listed as the owner of Registration No. 1,690,903 for the trademark MONSTER STYLE and that the goods listed in this registration are "educational; services, namely, conduction classes and seminars in the filed of audio systems." Applicant further admits that this registration identifies a registration date of June 2, 1992. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 5 and on that basis denies the allegations contained therein.

6. Applicant admits that Opposer is listed as the owner of Registration No. 1,342,164 for the trademark MONSTER CABLE and that the goods listed in this registration are "electrical signal transmitting cable and connectors." Applicant further admits that this registration identifies a registration date of June 18, 1985. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 6 and on that basis denies the allegations contained therein.

7. Applicant admits that Opposer is listed as the owner of Registration No. 1,340,229 for the trademark MONSTER CABLE and that the goods listed in this registration are "musical and voice signal transmitting cable and connectors." Applicant further admits that this registration identifies a registration date of June 11, 1985. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 7 and on that basis denies the allegations contained therein.

8. Applicant admits that Opposer is listed as the owner of Registration No. 1,384,076 for the trademark MONSTER CABLE (STYLIZED) and that the goods listed in this registration are "computer cables." Applicant further admits that this registration identifies a registration date of February 25, 1986. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 8 and on that basis denies the allegations contained therein.

9. Applicant admits that Opposer is listed as the owner of Registration No. 1,144,700 for the trademark MONSTER CABLE (STYLIZED) and that the goods listed in this registration are "speaker wire." Applicant further admits that this registration identifies a registration date of December 30, 1980. Applicant is without knowledge or information

sufficient to form a belief as to the truth of the remaining allegations of Paragraph 9 and on that basis denies the allegations contained therein.

10. Applicant admits that Opposer is listed as the owner of Registration No. 1,336,372 for the trademark MONSTER CABLE (STYLIZED) and that the goods listed in this registration are "audio cable." Applicant further admits that this registration identifies a registration date of May 21, 1985. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 10 and on that basis denies the allegations contained therein.

11. Applicant admits that Opposer is listed as the owner of Registration No. 1,844,244 for the trademark MONSTER HOME THEATRE and that the goods listed in this registration are "audio cables." Applicant further admits that this registration identifies a registration date of July 12, 1994. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 11 and on that basis denies the allegations contained therein.

12. Applicant admits that Opposer is listed as the owner of Registration No. 1,738,114 for the trademark MONSTER DESIGN and that the goods listed in this registration are "cable connectors for use with audio equipment." Applicant further admits that this registration identifies a registration date of December 8, 1992. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 12 and on that basis denies the allegations contained therein.

13. Applicant admits that Opposer is listed as the owner of Registration No. 1,537,306 for the trademark MONSTER MUSIC and that the goods listed in this registration are "compact discs." Applicant further admits that this registration identifies a registration date of

May 2, 1989. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 13 and on that basis denies the allegations contained therein.

14. Applicant admits that Opposer is listed as the owner of Registration No. 1,665,277 for the trademark MONSTER MUSIC and that the goods listed in this registration are "production of compact discs, audio tapes and phonographic records: distributorship services in the field of prerecorded compact discs, audio tapes and phonographic records of various artist." Applicant further admits that this registration identifies a registration date of November 19, 1991. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 14 and on that basis denies the allegations contained therein.

15. Applicant admits that Opposer is listed as the owner of Registration No. 2,584,318 for the trademark MONSTERLINKS and that the goods listed in this registration are "advertising for others via on-line electronic communication." Applicant further admits that this registration identifies a registration date of June 25, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 15 and on that basis denies the allegations contained therein.

16. Applicant admits that Opposer is listed as the owner of Registration No. 1,759, 527 for the trademark MONSTER SOUND and that the goods listed in this registration are "electrical cables and connectors and parts thereof." Applicant further admits that this registration identifies a registration date of March 23, 1993. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 16 and on that basis denies the allegations contained therein.

17. Applicant admits that Opposer is listed as the owner of Registration No. 1,428,215 for the trademark MONSTER VIDEO and that the goods listed in this registration are "video cables." Applicant further admits that this registration identifies a registration date of February 10, 1987. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 17 and on that basis denies the allegations contained therein.

18. Applicant admits that Opposer is listed as the owner of Registration No. 1,351,414 for the trademark MONSTER TIPS and that the goods listed in this registration are "electrical audio connectors for connecting home stereo and video components." Applicant further admits that this registration identifies a registration date of July 30, 1985. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 18 and on that basis denies the allegations contained therein.

19. Applicant admits that Opposer is listed as the owner of Registration No. 1,812,892 for the trademark MONSTER CONNECTION and that the goods listed in this registration are "newsletter about consumer electronics." Applicant further admits that this registration identifies a registration date of December 21, 1993. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 19 and on that basis denies the allegations contained therein.

20. Applicant admits that Opposer is listed as the owner of Registration No. 1,414,284 for the trademark I AM A MONSTER and that the goods listed in this registration are "t-shirts and jackets." Applicant further admits that this registration identifies a registration date of October 21, 1986. Applicant is without knowledge or information sufficient to form a belief

as to the truth of the remaining allegations of Paragraph 20 and on that basis denies the allegations contained therein.

21. Applicant admits that Opposer is listed as the owner of Registration No. 2,220,851 for the trademark MONSTER CENTRAL and that the goods listed in this registration are "electrical signals and distribution panels." Applicant further admits that this registration identifies a registration date of January 26, 1999. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 21 and on that basis denies the allegations contained therein.

22. Applicant admits that Opposer is listed as the owner of Registration No. 2,185,607 for the trademark MONSTER COMPUTER and that the goods listed in this registration are "computer cables." Applicant further admits that this registration identifies a registration date of September 1, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 22 and on that basis denies the allegations contained therein.

23. Applicant admits that Opposer is listed as the owner of Registration No. 2,215,211 for the trademark MONSTER MICROPHONE and that the goods listed in this registration are "microphones." Applicant further admits that this registration identifies a registration date of December 29, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 23 and on that basis denies the allegations contained therein.

24. Applicant admits that Opposer is listed as the owner of Registration No. 2,211,670 for the trademark MONSTER MOUNTS and that the goods listed in this registration are "loudspeaker mounting units." Applicant further admits that this registration identifies a

registration date of December 15, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 24 and on that basis denies the allegations contained therein.

25. Applicant admits that Opposer is listed as the owner of Registration No. 2,153,562 for the trademark MONSTER MULTIMEDIA and that the goods listed in this registration are "audio and video products namely, cable switch boxes, and junction boxes." Applicant further admits that this registration identifies a registration date of April 28, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 25 and on that basis denies the allegations contained therein.

26. Applicant admits that Opposer is listed as the owner of Registration No. 2,227,322 for the trademark MONSTER NETWORKING and that the goods listed in this registration are "connectors and cables for the transmission of data signals." Applicant further admits that this registration identifies a registration date of March 2, 1999. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 26 and on that basis denies the allegations contained therein.

27. Applicant admits that Opposer is listed as the owner of Registration No. 2,183,518 for the trademark MONSTER INTERNET and that the goods listed in this registration are "computer cables, telephone cables, and modems." Applicant further admits that this registration identifies a registration date of August 25, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 27 and on that basis denies the allegations contained therein.

28. Applicant admits that Opposer is listed as the owner of Registration No. 2,330,194 for the trademark MONSTER LOCK and that the goods listed in this registration are

"electrical connectors." Applicant further admits that this registration identifies a registration date of Mach 14, 2000. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 28 and on that basis denies the allegations contained therein.

29. Applicant admits that Opposer is listed as the owner of Registration No. 2,213,346 for the trademark MONSTER POWER and that the goods listed in this registration are "batteries, power strips, power line conditioners, and electrical power extension cords." Applicant further admits that this registration identifies a registration date of December 22, 1998. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 29 and on that basis denies the allegations contained therein.

30. Applicant admits that Opposer is listed as the owner of Registration No. 2,083,506 for the trademark MONSTER SATELLITE and that the goods listed in this registration are "satellite disk-to-receiver interconnect, electrical cables, electrical connectors and amplifiers, satellite receiver connection kit comprised of electrical cables and electrical connectors, amplifier, satellite finder." Applicant further admits that this registration identifies a registration date of July 29, 1997. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 30 and on that basis denies the allegations contained therein.

31. Applicant admits that Opposer is listed as the owner of Registration No. 2,055,050 for the trademark MONSTER CAR AUDIO and that the goods listed in this registration are "car audio cables, power and audio cables, power and audio cables, power cable terminators, ground cables, distributor blocks, fuse holders, car battery collets, audio interconnects, and contact ring terminals." Applicant further admits that this registration

identifies a registration date of April 22, 1997. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 31 and on that basis denies the allegations contained therein.

32. Applicant admits that Opposer is listed as the owner of Registration No. 2,381,247 for the trademark MONSTER DIGITAL and that the goods listed in this registration are "electronic signal transmitting cable and connectors." Applicant further admits that this registration identifies a registration date of April 29, 2000. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 32 and on that basis denies the allegations contained therein.

33. Applicant admits that Opposer is listed as the owner of Registration No. 2,381,246 for the trademark MONSTER STANDARD and that the goods listed in this registration are "electronic signal transmitting cable and connectors." Applicant further admits that this registration identifies a registration date of August 29, 2000. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 33 and on that basis denies the allegations contained therein.

34. Applicant admits that Opposer is listed as the owner of Registration No. 2,537,106 for the trademark MONSTER GAME and that the goods listed in this registration are "electronic entertainment system components, namely, stereo amplifiers, stereo tuners, stereo receives, televisions, video cassette recorders, and computer game equipment containing memory devices namely, discs." Applicant further admits that this registration identifies a registration date of February 5, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 34 and on that basis denies the allegations contained therein.

35. Applicant admits that Opposer is listed as the owner of Registration No. 2,724,015 for the trademark MONSTER and that the goods listed in this registration are "electronic cables, connectors and control devices for use with audio and video components." Applicant further admits that this registration identifies a registration date of June 10, 2003. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 35 and on that basis denies the allegations contained therein.

36. Applicant admits that Opposer is listed as the owner of Registration No. 2,617,707 for the trademark EMONSTER and that the goods listed in this registration are "promoting the goods and services of others by providing hypertext links to the web sites of others." Applicant further admits that this registration identifies a registration date of September 10, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 36 and on that basis denies the allegations contained therein.

37. Applicant admits that Opposer is listed as the owner of Registration No. 2,617,706 for the trademark IMONSTER and that the goods listed in this registration are "promoting the goods and services of others by providing hypertext links to the web sites of others." Applicant further admits that this registration identifies a registration date of September 10, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 37 and on that basis denies the allegations contained therein.

38. Applicant admits that Opposer is listed as the owner of Registration No. 2,627,042 for the trademark MONSTER and that the goods listed in this registration are "clothing, namely, sweatshirts, T-shirts, pants, jackets, and caps." Applicant further admits that

this registration identifies a registration date of October 1, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 38 and on that basis denies the allegations contained therein.

39. Applicant admits that Opposer is listed as the owner of Registration No. 2,575,745 for the trademark MONSTER and that the goods listed in this registration are "video game machines for use with televisions; and electronic game accessories, namely, electrical cables, electrical connectors and video game interactive remote control units." Applicant further admits that this registration identifies a registration date of June 4, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 39 and on that basis denies the allegations contained therein.

40. Applicant admits that Opposer is listed as the owner of Registration No. 2,774,858 for the trademark MONSTER and that the goods listed in this registration are "electrical and optical cables, wires and connectors for use with audio and video components." Applicant further admits that this registration identifies a registration date of June 4, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 39 and on that basis denies the allegations contained therein.

41. Applicant admits that Opposer is listed as the owner of Registration No. 2,812,869 for the trademark MONSTER ATTITUDE and that the goods listed in this registration are "clothing, namely T-shirts, sweatshirts, jackets, pants and caps." Applicant further admits that this registration identifies a registration date of February 10, 2004. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 41 and on that basis denies the allegations contained therein.

42. Applicant admits that Opposer is listed as the owner of Registration No. 2,569,988 for the trademark MONSTER BATTERIES and that the goods listed in this registration are "re-chargeable and non-rechargeable power storage cells." Applicant further admits that this registration identifies a registration date of May 14, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 42 and on that basis denies the allegations contained therein.

43. Applicant admits that Opposer is listed as the owner of Registration No. 2,561,769 for the trademark MONSTER BATTERY and that the goods listed in this registration are "re-chargeable and non-rechargeable power storage cells." Applicant further admits that this registration identifies a registration date of April 16, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 43 and on that basis denies the allegations contained therein

44. Applicant admits that Opposer is listed as the owner of Registration No. 2,623,566 for the trademark MONSTER BUCKS and that the goods listed in this registration are "marketing and product promotion services for others; namely, by distribution of product reward coupons to sales representative for redemption and/or redistribution to clients." Applicant further admits that this registration identifies a registration date of September 24, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 44 and on that basis denies the allegations contained therein.

45. Applicant admits that Opposer is listed as the owner of Registration No. 2,431,919 for the trademark MONSTER DESIGN and that the goods listed in this registration are "luggage" and "clothing, namely, shirts, head wear, and coats." Applicant further admits that this registration identifies a registration date of February 27, 2001. Applicant is without

knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 45 and on that basis denies the allegations contained therein.

46. Applicant admits that Opposer is listed as the owner of Registration No. 2,610,730 for the trademark MONSTER MOBILE and that the goods listed in this registration are "mobile telephone accessories, namely batteries and battery rechargers." Applicant further admits that this registration identifies a registration date of August 20, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 46 and on that basis denies the allegations contained therein.

47. Applicant admits that Opposer is listed as the owner of Registration No. 2,809,051 for the trademark MONSTER MOBILE and that the goods listed in this registration are "electrical equipment for recharging batteries." Applicant further admits that this registration identifies a registration date of January 27, 2004. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 47 and on that basis denies the allegations contained therein.

48. Applicant admits that Opposer is listed as the owner of Registration No. 2,728,729 for the trademark MONSTER POWER and that the goods listed in this registration are "electrical power control products, namely, batteries, power strip type electrical outlets, power line conditioners and electrical power extension cords." Applicant further admits that this registration identifies a registration date of June 24, 2003. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 48 and on that basis denies the allegations contained therein.

49. Applicant admits that Opposer is listed as the owner of Registration No. 2,634,360 for the trademark MONSTER SPORT and that the goods listed in this registration are

"clothing, namely, t-shirts, jackets, hats, polo shirts and vests." Applicant further admits that this registration identifies a registration date of October 15, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 49 and on that basis denies the allegations contained therein.

50. Applicant admits that Opposer is listed as the owner of Registration No. 2,639,223 for the trademark MONSTER USB and that the goods listed in this registration are "USB cables and connector devices for computers and components." Applicant further admits that this registration identifies a registration date of October 22, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 50 and on that basis denies the allegations contained therein.

51. Applicant admits that Opposer is listed as the owner of Registration No. 2,606,971 for the trademark MONSTER WIRE AMERICA and that the goods listed in this registration are "electrical signal transmitting cables and connectors." Applicant further admits that this registration identifies a registration date of August 13, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 51 and on that basis denies the allegations contained therein.

52. Applicant admits that Opposer is listed as the owner of Registration No. 2,782,260 for the trademark DUNGEON DICE MONSTERS and that the goods listed in this registration are "stand alone video output game machines." Applicant further admits that this registration identifies a registration date of November 11, 2003. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 52 and on that basis denies the allegations contained therein.

53. Applicant admits that Opposer is listed as the owner of Registration No. 2,782,261 for the trademark DUNGEON DICE MONSTERS and that the goods listed in this registration are "playing cards, game instruction manuals and computer games instruction." Applicant further admits that this registration identifies a registration date of January 20, 2004. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 53 and on that basis denies the allegations contained therein.

54. Applicant admits that Opposer is listed as the owner of Registration No. 2,806,860 for the trademark DUNGEON DICE MONSTERS and that the goods listed in this registration are "computer products, namely, computer game programs and video games." Applicant further admits that this registration identifies a registration date of January 20, 2004. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 54 and on that basis denies the allegations contained therein.

55. Applicant admits that Opposer is listed as the owner of Registration No. 2,998,513 for the trademark MONSTER and that the goods listed in this registration are "bowling balls." Applicant further admits that this registration identifies a registration date of September 20, 2005. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 55 and on that basis denies the allegations contained therein.

56. Applicant admits that Opposer is listed as the owner of Registration No. 2,177,372 for the trademark MONSTER 3D and that the goods listed in this registration are "graphic accelerators for multimedia systems." Applicant further admits that this registration identifies a registration date of July 28,1998. Applicant is without knowledge or information

sufficient to form a belief as to the truth of the remaining allegations of Paragraph 56 and on that basis denies the allegations contained therein.

57. Applicant admits that Opposer is listed as the owner of Registration No. 3,034,642 for the trademark MONSTER BASS and that the goods listed in this registration are "electrical and electronic control devices." Applicant further admits that this registration identifies a registration date of December 27, 2005. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 57 and on that basis denies the allegations contained therein.

58. Applicant admits that Opposer is listed as the owner of Registration No. 3,035,402 for the trademark MONSTER CLAMPS and that the goods listed in this registration are "electrical cables, connectors and control devices for use with audio." Applicant further admits that this registration identifies a registration date of December 27, 2005. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 58 and on that basis denies the allegations contained therein.

59. Applicant admits that Opposer is listed as the owner of Registration No. 3,032,580 for the trademark MONSTER GEAR and that the goods listed in this registration are "clothing, namely T-shirts, jackets, hats, polo shirts and vests." Applicant further admits that this registration identifies a registration date of December 20, 2005. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 59 and on that basis denies the allegations contained therein.

60. Applicant admits that Opposer is listed as the owner of Registration No. 3,055,801 for the trademark MONSTER GEAR and that the goods listed in this registration are "luggage." Applicant further admits that this registration identifies a registration date of January

31, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 60 and on that basis denies the allegations contained therein.

61. Applicant admits that Opposer is listed as the owner of Registration No. 2,972,563 for the trademark MONSTER MINTS and that the goods listed in this registration are "mint candy." Applicant further admits that this registration identifies a registration date of July 19, 2005. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 61 and on that basis denies the allegations contained therein.

62. Applicant admits that Opposer is listed as the owner of Registration No. 3,051,578 for the trademark MONSTER PHOTO and that the goods listed in this registration are "rechargeable and non-rechargeable power cells." Applicant further admits that this registration identifies a registration date of January 24, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 62 and on that basis denies the allegations contained therein.

63. Applicant admits that Opposer is listed as the owner of Registration No. 3,060,864 for the trademark MONSTER POWERCELL and that the goods listed in this registration are "electrical power control components and accessories, namely, electrical and electromagnetic cables and connectors." Applicant further admits that this registration identifies a registration date of February 21, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 63 and on that basis denies the allegations contained therein.

64. Applicant admits that Opposer is listed as the owner of Registration No. 3,040,944 for the trademark MONSTER ULTRA and that the goods listed in this registration are "electrical and electromagnetic signal transmitting, amplifying, receiving, and converting devices." Applicant further admits that this registration identifies a registration date of January 10, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 64 and on that basis denies the allegations contained therein.

65. Applicant admits that Opposer is listed as the owner of Registration No. 3,057,145 for the trademark MONSTER UNIVERSITY and that the goods listed in this registration are "educational and training services, namely, conducting online training." Applicant further admits that this registration identifies a registration date of February 7, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 65 and on that basis denies the allegations contained therein.

66. Applicant admits that Opposer is listed as the owner of Registration No. 3,045,555 for the trademark MONSTER WIRED and that the goods listed in this registration are "providing on-line newsletters containing information about cable, power and electronic devices." Applicant further admits that this registration identifies a registration date of January 17, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 66 and on that basis denies the allegations contained therein.

67. Applicant admits that Opposer is listed as the owner of Registration No. 2,622,686 for the trademark MONSTERBOOK and that the goods listed in this registration are "promoting the goods and services of companies that do business on the internet." Applicant

further admits that this registration identifies a registration date of September 24, 2002. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 67 and on that basis denies the allegations contained therein.

68. Applicant admits that Opposer is listed as the owner of Registration No. 2,775,969 for the trademark MONSTERGUIDE and that the goods listed in this registration are "providing an on-line directory listing companies that do business over global computer networks." Applicant further admits that this registration identifies a registration date of October 21, 2003. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 68 and on that basis denies the allegations contained therein.

69. Applicant admits that Opposer is listed as the owner of Registration No. 2,704,953 for the trademark MONSTERMONEY and that the goods listed in this registration are "electronic commerce services, namely, electronic processing and transmission of bill payment data." Applicant further admits that this registration identifies a registration date of April 8, 2003. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 69 and on that basis denies the allegations contained therein.

70. Applicant admits that Opposer is listed as the owner of Registration No. 3,026,590 for the trademark MONSTEROUS and that the goods listed in this registration are "electrical and electronic control devices, namely electrical and electromagnetic signal transmitting, amplifying, receiving, and converting devices." Applicant further admits that this registration identifies a registration date of December 13, 2005. Applicant is without knowledge

or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 70 and on that basis denies the allegations contained therein.

71. Applicant admits that Opposer is listed as the owner of Registration No. 3,076,122 for the trademark MONSTER POWER and Design (with electron) and that the goods listed in this registration are "electrical and electronic control devices." Applicant further admits that this registration identifies a registration date of April 4, 2006. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 71 and on that basis denies the allegations contained therein.

72. Applicant is without knowledge or information sufficient to form a belief as to the truth the allegation of Paragraph 73 and on that basis denies the allegations contained therein.

73. Applicant is without knowledge or information sufficient to form a belief as to the truth the allegation of Paragraph 73 and on that basis denies the allegations contained therein.

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74. Applicant denies the allegations of Paragraph 74.

WHEREFORE, having fully answered the Notice of Opposition to Applicant's registration of the subject mark, Applicant prays that registration be granted and that the Opposition be dismissed with prejudice.

Respectfully submitted,

Dated: September 5, 2006

Tabetha D. Plummer

Tabetha D. Plummer, Esq.
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CERTIFICATE OF SERVICE

I herby certify that a true and complete copy of the foregoing Answer to Notice of Opposition has been served on Matthew A. Powelson, Esq. by mailing said copy on September 5, 2006, via First Class Mail, postage prepaid to:

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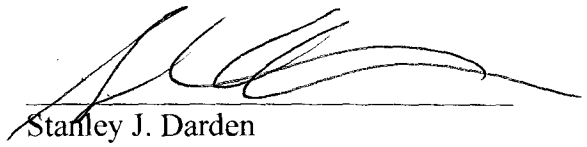

Stanley J. Darden