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

Proceeding	91197397
Party	Defendant MoneyGram International, Inc.
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Date	08/22/2011
Attachments	Opp No 91197397 Answer to Notice of Opposition.pdf (4 pages)(90500 bytes)

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

In the Matter of Application Serial No. 77/897,295
For the Mark: CHOICE IS IN YOUR HANDS
Filed: December 18, 2009
Published: May 18, 2010

CITIGROUP INC.,)	
)	Opposition No. 91197397
Opposer,)	
)	<u>ANSWER TO</u>
v.)	<u>NOTICE OF OPPOSITION</u>
)	
MONEYGRAM INTERNATIONAL,)	
INC.,)	
)	
Applicant.)	
)	

For its Answer to the Notice of Opposition of Citigroup, Inc. (“Opposer”), MoneyGram International, Inc. (“MoneyGram”), a Delaware corporation having its principal place of business at 2828 N. Harwood Street, 15th Floor, Dallas, TX 75201, answers and alleges as follows. Except as hereinafter expressly admitted, qualified or otherwise answered, MoneyGram denies each and every allegation, matter, statement and thing asserted in Opposer’s Notice of Opposition (the “Notice”).

1. MoneyGram is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1 of the Notice.

2. MoneyGram is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2 of the Notice, except MoneyGram admits on information and belief that Opposer owns U.S. Registration No. 1,206,796, states that U.S.

Registration No. 1,206,796 speaks for itself, admits upon information and belief that U.S.

Registration No. 1,206,796 has become “incontestable” within the meaning of Section 15 of the Lanham Act, and admits that a print-out was attached to the Notice as Exhibit A.

3. MoneyGram admits the allegations of paragraph 3 of the Notice. MoneyGram further states that its principal business address is 2828 N. Harwood Street, 15th Floor, Dallas, TX 75201.

4. MoneyGram admits the allegations of paragraph 4 of the Notice, except states that the application was filed on December 18, 2009.

5. MoneyGram denies the allegations of paragraphs 5, 6 and 7 of the Notice.

WHEREFORE, MoneyGram prays that Opposer’s Notice of Opposition be dismissed with prejudice and on the merits.

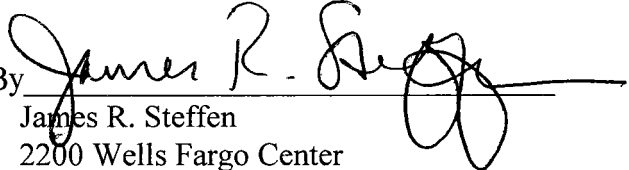
Consistent with Trademark Rule 2.18, please address all correspondence relating to the above-captioned opposition proceeding to:

James R. Steffen
Faegre & Benson LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
Telephone: (612) 766-7000
Facsimile: (612) 766-1600
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No fees are seen to be due in connection with the filing of this Answer to Notice of Opposition; however, if it is determined that any such fees are due, the Commissioner may charge them to Deposit Account No. 06-0029.

Dated: August 22, 2011

FAEGRE & BENSON LLP,
as Attorneys for Applicant

By 
James R. Steffen
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
Telephone: (612) 766-7000
Facsimile: (612) 766-1600

CERTIFICATE OF SERVICE

I, Alyssa Bloch, do hereby certify that a true and correct copy of the above and foregoing document has been forwarded by United States mail, first class, postage prepaid, to:

John P. Margiotta
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017

as representative of Opposer, this 22d day of August 2011.

Alyssa Bloch