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Filing date: **08/08/2011**

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

Proceeding	91200435
Party	Defendant Skymarker LLC
Correspondence Address	D. REEVES CARTER GUZOV OFSINK, LLC 900 3RD AVE FL 5 NEW YORK, NY 10022-3055 rcarter@golawintl.com
Submission	Answer
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Date	08/08/2011
Attachments	img014.pdf (4 pages)(127387 bytes)

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

CVG-SAB, LLC)	
)	
Opposer)	Opposition No. 91200435
)	
against)	Application Serial No. 85/215,656
)	
SKYMARKER, LLC)	Mark: WANT!
)	
Applicant)	Published for Opposition: May 24, 2011
)	

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

COMES NOW the Applicant, Skymarker, LLC, by and through counsel, and states as follows:

1. Applicant lacks sufficient information or knowledge to establish the truth of the allegations set forth in paragraph 1 of the Notice of Opposition, and therefore denies the same and demands strict proof thereof.
2. Applicant denies the allegations set forth in paragraph 2 of the Notice of Opposition.
3. Applicant lacks sufficient information or knowledge to establish the truth of the allegations set forth in paragraph 3 of the Notice of Opposition, and therefore denies the same and demands strict proof thereof.
4. Applicant lacks sufficient information or knowledge to establish the truth of the allegations set forth in paragraph 4 of the Notice of Opposition, and therefore denies the same and demands strict proof thereof.

5. Applicant lacks sufficient information or knowledge to establish the truth of the allegations set forth in paragraph 5 of the Notice of Opposition, and therefore denies the same and demands strict proof thereof.

6. Applicant denies the allegations set forth in paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegations set forth in paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations set forth in paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations set forth in paragraph 9 of the Notice of Opposition.

All allegations set forth in the Notice of Opposition that have not been admitted or denied are now denied generally and to the same effect as if specifically denied.

AFFIRMATIVE DEFENSE NO. 1

10. Notice of Opposition fails to state a claim upon which relief can be granted, and in particular, fails to state legally sufficient grounds for sustaining the Opposition.

AFFIRMATIVE DEFENSE NO. 2

11. There is no likelihood of confusion between Applicant's mark and Opposer's cited marks.

AFFIRMATIVE DEFENSE NO. 3

12. At best, Opposer's rights in the cited marks are of a narrow or limited scope.

AFFIRMATIVE DEFENSE NO. 4

13. Applicant's mark in its entirety is sufficiently distinctive from Opposer's cited marks so as to avoid consumer confusion, deception or mistake.

AFFIRMATIVE DEFENSE NO. 5

14. Applicant's mark, when used on and in connection with Applicant's services, is not likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection with or association of Applicant with Opposer, or as to the origin, sponsorship, or approval of Applicant's goods by Opposer.

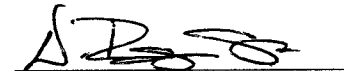
AFFIRMATIVE DEFENSE NO. 6

15. Applicant has superior and prior rights.

WHEREFORE, for the reasons stated above, Applicant prays that the Board will find that Opposer has no grounds to oppose the registration of Applicant's mark and will dismiss the Opposition with prejudice and award costs to Applicant.

Respectfully submitted,

D. Reeves Carter, Esq.



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CERTIFICATE OF MAILING

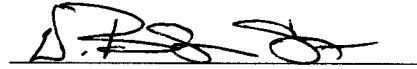
I hereby certify that this correspondence is being deposited with the U.S. Postal Service as first class mail in an envelope addressed to U.S. Department of Commerce, Patent and Trademark Office, Trademark Trial and Appeal Board. PO Box 1451, Alexandria, VA22313-1451 on August 6, 2011.



D. Reeves Carter

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed, postage prepaid to Kristen L. Pursley, Dobrusin & Thennisch, PC, 29 West Lawrence Street, Suite 210, Pontiac, MI 48342 on August 6, 2011.



D. Reeves Carter