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

Proceeding	91204167
Party	Defendant Grant Thornton LLP
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

THE UNIVERSITY OF NORTH	)	
CAROLINA AT CHAPEL HILL,	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91204167
	)	
GRANT THORNTON LLP,	)	
	)	
Applicant.	)	

**ANSWER**

Applicant Grant Thornton LLP ("Applicant"), for its Answer to the Notice of Opposition filed by Opposer The University of North Carolina at Chapel Hill ("UNC") responds as follows.

1. Applicant admits that it filed Application Serial No. 85/124,591 on September 8, 2010, and that such application alleged a date of first use of June 1984, pursuant to Section 1(a) of the Lanham Act, 15 U.S.C. § 1051(a). Applicant further admits that Application Serial No. 85/124,591 identifies the following services: "pamphlets and brochures ranking privately held businesses" in Class 16 and "entertainment and educational services, namely, providing a website that displays rankings of the top 100 privately held companies in the state of North Carolina" in Class 41.

2. Applicant admits that Application Serial No. 85/124,591 was published for Opposition in the Official Gazette on September 6, 2011. Applicant is without knowledge or information to form a belief as to the truth of the remaining allegations of Paragraph 2, and therefore denies them.

3. Answering the allegations of Paragraph 3 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

4. Answering the allegations of Paragraph 4 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

5. Answering the allegations of Paragraph 5 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

6. Answering the allegations of Paragraph 6 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

7. Applicant admits that Opposer is identified as the registrant of U.S. Trademark Registration No. 1,263,599 in the United States Patent and Trademark Office's Trademark Applications and Registrations Retrieval (TARR) system. Applicant also admits that the record for this registration on the TARR system identifies the mark, goods and services, and dates of first use reflected in Exhibit A of Paragraph 7 of the Notice of Opposition.

8. Applicant admits that U.S. Trademark Registration No. 1,263,599 is identified as incontestable pursuant to 15 U.S.C. § 1065 in the United States Patent and Trademark Office's TARR system. Applicant is without knowledge sufficient to form a belief as to the truth of the remaining allegations, and accordingly denies them in full.

9. Applicant admits that Opposer is identified as the registrant of U.S. Trademark Registration No. 1,255,655 in the United States Patent and Trademark Office's Trademark Applications and Registrations Retrieval (TARR) system. Applicant also admits that the record for this registration on the TARR system identifies the mark, services, and dates of first use reflected in Exhibit B of Paragraph 9 of the Notice of Opposition.

10. Applicant admits that U.S. Trademark Registration No. 1,255,655 is identified as incontestable pursuant to 15 U.S.C. § 1065 in the United States Patent and Trademark Office's TARR system. Applicant is without knowledge sufficient to form a belief as to the truth of the remaining allegations, and accordingly denies them in full.

11. Applicant admits that Opposer is identified as the registrant of U.S. Trademark Registration No. 1,255,592 in the United States Patent and Trademark Office's Trademark Applications and Registrations Retrieval (TARR) system. Applicant also admits that the record for this registration on the TARR system identifies the mark, services, and dates of first use reflected in Exhibit C of Paragraph 11 of the Notice of Opposition.

12. Answering the allegations of Paragraph 12 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

13. Answering the allegations of Paragraph 13 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

14. Applicant admits that Opposer is identified as the applicant for U.S. Trademark Application Serial No. 85/328,565 in the United States Patent and Trademark Office's Trademark Applications and Registrations Retrieval (TARR) system. Applicant also admits that the record for this application on the TARR system identifies the mark, goods and dates of first use reflected in Exhibit D of Paragraph 14 of the Notice of Opposition.

15. Admitted.

16. Answering the allegations of Paragraph 16 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

17. Denied.

18. Denied.

19. Denied.


20. Answering the allegations of Paragraph 20 of the Notice of Opposition, Applicant is without knowledge sufficient to form a belief as to the truth of such allegations, and accordingly denies them in full.

WHEREFORE, Applicant prays that judgment be entered in favor of Applicant and against Opposers, and that a Notice of Allowance be issued to Applicant with respect to Application Serial No. 85/125,591.

Respectfully submitted,

PATTISHALL, McAULIFFE, NEWBURY,  
HILLIARD & GERALDSON LLP

Dated: June 15, 2012

By: 

Thad Chaloehtiarana

Jasmine R. Davis

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*Attorneys for Applicant, Grant Thornton LLP*

**CERTIFICATE OF TRANSMISSION**

I hereby certify that a true and correct copy of the foregoing **ANSWER** was electronically transmitted to the Trademark Trial and Appeal Board on June 15, 2012.

Jasmine Davis

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **ANSWER** was served upon Opposers via first-class mail, postage prepaid, addressed to Harris W. Henderson, Kilpatrick Townsend & Stockton LLP, 1100 Peachtree Street, Suite 2800, Atlanta, Georgia, 30309, on June 15, 2012.

Jasmine Davis