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

Proceeding	91215600
Party	Defendant The Small-Scale Sustainable Infrastructure Development Fund, Inc.re Development Fund, Inc.
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Date	05/05/2014
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

SAMBA FINANCIAL GROUP,

Opposer,

v.

THE SMALL-SCALE SUSTAINABLE  
INFRASTRUCTURE DEVELOPMENT  
FUND, INC.

Applicant.

Opposition No. 91215600

Applications S.N.

85/941957

85/941952

**APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

Applicant The Small-Scale Sustainable Infrastructure Development Fund, Inc. (hereinafter "Applicant"), answers the corresponding numbered paragraphs of the Notice of Opposition filed by Opposer, Samba Financial Group (hereinafter "Opposer") as follows:

To the extent the first unnumbered paragraph of the Notice of Opposition sets forth allegations that must be admitted or denied, Applicant denies same and specifically denies that it has applied to register the mark SOCIAL MARKET BANK APPROACH (SMBA).

1. Applicant lacks sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 1 of the Notice of Opposition and therefore denies same.
2. Applicant lacks sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 2 of the Notice of Opposition and therefore denies same.
3. Applicant lacks sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 3 of the Notice of Opposition and therefore denies same.
4. Applicant lacks sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 4 of the Notice of Opposition and therefore denies same.
5. Applicant admits that Samba Financial Group is the owner of record of Registration

Nos. 3587286 for SAMBA (PLUS DESIGN), 3771788 for SAMBA AL KHAIR (PLUS DESIGN), 3771787 for SAMBA AL KHAIR ISLAMIC FINANCIAL SOLUTIONS (PLUS DESIGN), and 3427266 for SAMBA FINANCIAL GROUP (PLUS DESIGN).

6. Applicant admits that it filed Application No. 85/941957 on May 24, 2013 to register the mark SMBA. Applicant also admits that it filed Application No. 85/941952 on May 24, 2013, but denies that the application was for registration of the mark SOCIAL MARKET BANK APPROACH (SMBA). Otherwise, Applicant lacks sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 6 of the Notice of Opposition and therefore denies same.

7. Applicant denies the allegations of Paragraph 7 of the Notice of Opposition.

8. Applicant admits the allegations of Paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations of Paragraph 9 of the Notice of Opposition.

#### **AFFIRMATIVE DEFENSES**

1. Opposer fails to state a claim upon which relief may be granted.

2. Applicant reserves the right to assert additional affirmative defenses as may be warranted by discovery in this matter.

WHEREFORE, Applicant prays that this Opposition be dismissed.

Respectfully submitted,

THE SMALL-SCALE SUSTAINABLE  
INFRASTRUCTURE DEVELOPMENT  
FUND, INC.

/Anthony E. Rufo/

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(617) 832-1000

Dated: May 5, 2014

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Answer to the Notice of Opposition was served upon Opposer's attorney of record as shown on the USPTO website, namely:

Steven P. Hollman, Esq.  
Timothy J. Lyden, Esq.  
Hogan Lovells US LLP  
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by e-mail and First Class Mail this date of May 5, 2014.

/Madeleine K. Rodriguez/  
Madeleine K. Rodriguez