

ESTTA Tracking number: **ESTTA765777**

Filing date: **08/22/2016**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	The Port Authority of New York and New Jersey
Granted to Date of previous extension	08/21/2016
Address	4 World Trade Center, 23rd Floor, 150 Greenwich Street New York, NY 10007 UNITED STATES

Attorney information	Michael Geller DLA Piper LLP 203 North LaSalle Street, Suite 1900 Chicago, IL 60601 UNITED STATES michael.geller@dlapiper.com, leon.medzhibovsky@dlapiper.com, keith.medansky@dlapiper.com, ch.tm@dlapiper.com Phone:312.368.4000
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**Applicant Information**

Application No	86728191	Publication date	02/23/2016
Opposition Filing Date	08/22/2016	Opposition Period Ends	08/21/2016
Applicant	Reed Exhibitions Limited Gateway House Richmond, Surrey, TW91DN UNITED KINGDOM		

**Goods/Services Affected by Opposition**

<p>Class 041. First Use: 2011/11/30 First Use In Commerce: 2011/11/30 All goods and services in the class are opposed, namely: Organizing, arranging and conducting of educational and cultural exhibitions, conferences, conventions, seminars, workshops, and educational and cultural expositions in the field of on-board catering and travel services; conducting educational exhibitions, conferences, conventions, seminars, workshops, and educational and cultural expositions in the fields of on-board catering and travel services; providing a website featuring information, assistance and advice in the field of educational and cultural exhibitions, conferences, and educational and cultural expositions in the fields of on-board catering and travel services for exhibition and conference attendants, visitors and exhibitors; training services in the fields of on-board catering and travel services; publication of texts all relating to exhibitions, conferences, conventions, seminars, workshops, expositions and events, all of the aforesaid in the field of on-board catering and travel services</p>
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**Grounds for Opposition**

Other	The grounds are stated in the pleading for the notice of opposition.
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Attachments	Port Authority - Notice of Opposition - WTCE.pdf(122578 bytes )
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### **Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Michael Geller/
Name	Michael Geller
Date	08/22/2016

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

In re Serial No. 86/728,191  
Mark: WTCE  
Filed: August 18, 2015  
Published: February 23, 2016

THE PORT AUTHORITY OF NEW YORK AND	)	
NEW JERSEY	)	
	)	
Opposer,	)	
	)	Opposition No.:
v.	)	
	)	
REED EXHIBITIONS LIMITED	)	
	)	
Applicant.	)	

**NOTICE OF OPPOSITION**

**THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY**, a body corporate and politic created by a compact between the states of New York and New Jersey with the consent of the United States Congress located at 4 World Trade Center, 150 Greenwich Street, 23<sup>rd</sup> Floor, New York, New York 10007 (hereinafter "Opposer"), believes that it would be damaged by registration of the mark shown in Application Serial No. 86/728,191 (hereinafter "the Application"), filed August 23, 2015 by Reed Exhibitions Limited (hereinafter "Applicant"), published in the Official Gazette of the United States Patent and Trademark Office (hereinafter the "USPTO") on February 23, 2016, and hereby opposes the registration of such mark.

The grounds for the opposition are as follows:

1. Opposer is a body corporate and politic created in 1921 that manages various areas, elements of infrastructure and methods of transportation including, but not limited to, bridges, tunnels, airports and transit in New York City and Northern New Jersey.

2. In 1962, Opposer was granted the statutory right and obligation by the states of New York and New Jersey to develop and manage an area in downtown New York City, which the statutes named the World Trade Center. N.Y. Unconsol. § 6602 (McKinney 2006); N.J. Stat. Ann. § 32:1-35.51 (2006).

3. The World Trade Center was home to the “Twin Towers,” which were destroyed in the September 11, 2001 terrorist attacks, and now features the building named “One World Trade Center,” among other buildings, monuments and transportation facilities (collectively, the “Site”).

4. In or around 1961, Opposer adopted and began using the trademark WORLD TRADE CENTER in connection with its services offered at the Site. Subsequently, Opposer adopted and began using the trademark WTC as an acronym for the WORLD TRADE CENTER mark in connection with its products and services offered at the Site.

5. The grant of a registration to Applicant for the WTCE mark as sought in the Application (hereinafter “Applicant’s Mark”) should be denied because Opposer is the owner of the trademark WTC in connection with the services claimed in the Application, or services similar thereto. Applicant’s Mark fully incorporates Opposer’s WTC trademark and covers identical or highly similar services as Opposer’s WTC trademark. Granting registration to Applicant for Applicant’s Mark will disrupt Opposer’s statutory right to exclusive use and

control of the WTC trademark, all to the damage and injury of the purchasing public and to the damage and injury of Opposer.

6. Alternatively, Opposer asserts that granting registration to Applicant for Applicant's Mark will deprive Opposer the right to use the WTC mark in connection with the services claimed in the Application, in derogation of the statutory mandate obligating Opposer to manage and operate the World Trade Center site.

**WHEREFORE**, Opposer files this Notice of Opposition and prays that the aforesaid application of Reed Exhibitions Limited, herein opposed, be rejected; that no registration be issued thereon to Applicant; and for such other and further relief as may be deemed just and proper.

The Deposit Account No. 18-2284 should be charged the amount of \$300.00 to cover the filing fees of this notice of opposition against the Application. Please charge any additional fees to Deposit Account No. 18-2284, and address all correspondence regarding this opposition to the undersigned.

Notice of Opposition  
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Dated: August 22, 2016

Respectfully submitted,

**THE PORT AUTHORITY OF NEW YORK  
AND NEW JERSEY**

By: /s/ Michael A. Geller

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this correspondence is being deposited with the United States Postal Service as First-Class Mail in an envelope addressed to the correspondent of record:

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/s/ Michael A. Geller  
Signature

Michael A. Geller  
Name

August 22, 2016  
Date of Signature