

ESTTA Tracking number: **ESTTA771905**

Filing date: **09/21/2016**

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	09/21/2016
Address	4 World Trade Center 150 Greenwich Street, 23rd Floor 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	86846991	Publication date	05/24/2016
Opposition Filing Date	09/21/2016	Opposition Period Ends	09/21/2016
Applicant	Doan, Robert T. Suite C El Cajon, CA 92020 UNITED STATES		

Goods/Services Affected by Opposition

Class 041. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Training services in the field of installing window tinting on automobile, residential and commercial windows featuring a franchise instructional system

Grounds for Opposition

Other	The ground are stated in the pleading for the notice of opposition.
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Attachments	Port Authority - Notice of Opposition Against WTC SYSTEM.pdf(121226 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	09/21/2016

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

In re Serial No. 86/846,991
Mark: WTC SYSTEM
Filed: December 11, 2015
Published: May 24, 2016

THE PORT AUTHORITY OF NEW YORK AND)	
NEW JERSEY)	
)	
Opposer,)	
)	Opposition No.:
v.)	
)	
ROBERT T. DOAN)	
)	
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, 23rd Floor, New York, New York 10007 (hereinafter "Opposer"), believes that it would be damaged by registration of the mark shown in Application Serial No. 86/846,991 (hereinafter "the Application"), filed December 11, 2015 by Robert T. Doan (hereinafter "Applicant"), published in the Official Gazette of the United States Patent and Trademark Office (hereinafter the "USPTO") on May 24, 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 WTC SYSTEM 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. 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. A third party, the World Trade Centers Association, has filed a federal complaint against Opposer regarding Opposer's use of the WORLD TRADE CENTER and WTC trademarks (the "Litigation"). The Litigation substantially bears on this opposition, and, therefore, Opposer, in a separate filing, requests a suspension of this opposition.

WHEREFORE, Opposer files this Notice of Opposition and prays that the aforesaid application of Robert T. Doan, 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
Appln. Ser. No. 86/846,991 - Page 4

Dated: September 21, 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:

Robert T. Doan
1675 Pioneer Way
Suite C
El Cajon, California 92020

/s/ Michael A. Geller
Signature

Michael A. Geller
Name

September 21, 2016
Date of Signature