

ESTTA Tracking number: **ESTTA813049**

Filing date: **04/12/2017**

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

Proceeding	91230403
Party	Defendant Luigi Boschin
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Submission	Answer
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Date	04/12/2017
Attachments	Boschin Answer.pdf(76738 bytes)

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

Securrency, Inc.,

Opposer,

v.

Luigi Boschin,

Applicant.

Opposition No. 91230403
Application Serial No. 86/904,230
Mark: SECURENCY

APPLICANT LUIGI BOSCHIN'S ANSWER

Applicant Luigi Boschin ("Applicant") hereby answers the Notice of Opposition filed by Securrency, Inc. ("Opposer") as follows:

In response to the grounds for opposition enumerated in Opposer's Electronic System for Trademark Trials and Appeals ("ESTTA") Notice of Opposition form, Applicant denies that there are any grounds to sustain the opposition and denies that Opposer owns any mark(s) sufficient to constitute a basis for the opposition.

In response to the unnumbered introductory paragraph, Applicant denies that Opposer will be damaged by the registration of Application Serial No. 86/904,230.

1. In response to paragraph 1, Applicant responds that it lacks sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 1 and, therefore, denies each and every allegation in paragraph 1.

2. In response to paragraph 2, Applicant admits that Luigi Boschin filed Application Serial No. 86/904,230 for SECURENCY and that Luigi Boschin has an address at 1950 S. Ocean Drive, Suite L, Hallandale, Florida 33009.

3. In response to paragraph 3, Applicant denies each and every allegation in paragraph 3.

4. In response to paragraph 4, Applicant denies each and every allegation in paragraph 4.

5. In response to paragraph 5, Applicant denies each and every allegation in paragraph 5.

6. In response to paragraph 6, Applicant responds that it lacks sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 6 and, therefore, denies each and every allegation in paragraph 6.

7. In response to paragraph 7, Applicant denies each and every allegation in paragraph 7.

8. In response to paragraph 8, Applicant responds that it lacks sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 8 and, therefore, denies each and every allegation in paragraph 8.

9. In response to paragraph 9, Applicant responds that it lacks sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 9 and, therefore, denies each and every allegation in paragraph 9.

10. In response to paragraph 10, Applicant denies each and every allegation in paragraph 10.

11. In response to paragraph 11, Applicant denies that Opposer has any rights in its claimed marks that would allow it to claim a likelihood of confusion.

12. In response to paragraph 12, Applicant denies that all of Opposer's claimed marks are identical to SECURENCY.

13. In response to paragraph 13, Applicant responds that it lacks sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 13 and, therefore, denies each and every allegation in paragraph 13.

14. In response to paragraph 14, Applicant denies each and every allegation in paragraph 14.

15. In response to paragraph 15, Applicant denies each and every allegation in paragraph 15.

16. In response to paragraph 16, Applicant denies each and every allegation in paragraph 16.

17. In response to paragraph 17, Applicant denies each and every allegation in paragraph 17.

18. In response to paragraph 18, Applicant denies each and every allegation in paragraph 18.

19. In response to paragraph 19, Applicant denies each and every allegation in paragraph 19.

20. In response to paragraph 20, Applicant denies each and every allegation in paragraph 20.

21. In response to paragraph 21, Applicant denies each and every allegation in paragraph 21.

22. In response to paragraph 22, Applicant denies each and every allegation in paragraph 22.

23. Paragraph 23 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

24. Paragraph 24 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

25. Paragraph 25 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

26. Paragraph 26 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

27. Paragraph 27 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

28. Paragraph 28 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

29. Paragraph 29 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

30. Paragraph 30 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

31. Paragraph 31 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

32. Paragraph 32 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

33. Paragraph 33 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

34. Paragraph 34 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

35. Paragraph 35 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

36. Paragraph 36 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

37. Paragraph 37 of Opposer's Notice of Opposition has been stricken by the Board's February 28, 2017 Order and no response is required.

FIRST AFFIRMATIVE DEFENSE
NO INJURY OR DAMAGE

38. Opposer's claims are barred, in whole or in part, because Opposer has not and will not suffer any injury or damage from the registration of Applicant's U.S. Application Serial No. 86/904,230.

SECOND AFFIRMATIVE DEFENSE
FAILURE TO STATE A CLAIM


38. Opposer's Notice of Opposition fails to state a claim for relief.

THIRD AFFIRMATIVE DEFENSE
PRIORITY OF RIGHTS

38. Opposer's claims are barred, in whole or in part, because Applicant has priority of rights in the SECURENCY trademark.

Dated: April 12, 2017

Respectfully submitted,



Bruno W. Tarabichi
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Attorneys for Applicant
Luigi Boschin

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copies of the following documents:

APPLICANT LUIGI BOSCHIN'S ANSWER

has been served on

Kevin Keener
Keener & Associates, PC
161 North Clark Street, Suite 4700
Chicago, IL 60601

by emailing such document on April 12, 2017 to the above address.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Dated: November 14, 2016



Bruno W. Tarabichi