

ESTTA Tracking number: **ESTTA785017**

Filing date: **11/23/2016**

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

Proceeding	91231395
Party	Defendant World Trade Centers Association, Inc.
Correspondence Address	LINDSAY KASSOF 120 Broadway Ste 3350 New York, NY 10271-0024  lkassof@wtca.org;srichie@wtca.org
Submission	Opposition/Response to Motion
Filer's Name	Lindsay Kassof
Filer's e-mail	lkassof@wtca.org
Signature	/Lindsay Kassof/
Date	11/23/2016
Attachments	Response to Motion for Suspension.pdf(215800 bytes )

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

In re Serial No. 86/570,245  
Mark: WORLD TRADE CENTER MIAMI  
Filed: March 19, 2015  
Published: July 26, 2016

-----X  
THE PORT AUTHORITY OF NEW YORK  
AND NEW JERSEY,

Opposer,

-v-

Opposition No. 91231395

WORLD TRADE CENTERS ASSOCIATION,  
INC.,

Applicant.

-----X

**APPLICANT'S RESPONSE TO  
OPPOSER'S MOTION FOR SUSPENSION**

Applicant World Trade Centers Association, Inc. ("Applicant") does not object to the motion filed by Opposer The Port Authority of New York and New Jersey ("Opposer") on November 23, 2016 requesting suspension of the opposition pending a final determination of the federal court complaint filed by Applicant against Opposer.

Dated: November 23, 2016

WORLD TRADE CENTERS  
ASSOCIATION, INC.

By:           /Lindsay Kassof/          

Lindsay Kassof, Esq.  
Associate Counsel  
World Trade Centers Association, Inc.  
120 Broadway, Suite 3350  
New York, NY 10271  
Tel: (212) 432-2652  
Fax: (212) 488-0064  
Email: [lkassof@wtca.org](mailto:lkassof@wtca.org)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing APPLICANT'S RESPONSE TO OPPOSER'S MOTION FOR SUSPENSION is being served upon Opposer's counsel of record on this 23<sup>rd</sup> day of Novmeber, 2016, by mailing a true copy thereof by first class mail, postage prepaid, addressed as follows:

MICHAEL GELLER  
DLA PIPER LLP  
203 NORTH LASALLE ST, STE 1900  
CHICAGO, IL 60601  
UNITED STATES

\_\_\_\_\_  
/Lindsay Kassof/

Lindsay Kassof