

ESTTA Tracking number: **ESTTA1056826**

Filing date: **05/20/2020**

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

Proceeding	91237356
Party	Plaintiff Rocket Sports, LLC
Correspondence Address	PAUL W KODA KODA LAW FIRM PLLC 1775 EYE STREET NW SUITE 1150 WASHINGTON, DC 20006 UNITED STATES paul@kodafirm.com 240-997-1116
Submission	Answer to Counterclaim
Filer's Name	Paul W. Koda
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Signature	/Paul W. Koda/
Date	05/20/2020
Attachments	Opposers Answer to Counterclaim in Opposition No 91237356.pdf(82191 bytes)

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

ROCKET SPORTS, LLC	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91237356
	:	
DEXTER KAN	:	
	:	
Applicant.	:	

**OPPOSER’S ANSWER TO COUNTERCLAIM IN
APPLICANT’S AMENDED ANSWER TO
OPPOSER’S AMENDED NOTICE OF OPPOSITION**

COMES NOW Opposer Rocket Sports, LLC (“Opposer”) and answers Applicant’s Counterclaim set forth in Applicant’s Amended Answer to Opposer’s Amended Notice of Opposition, which is identified in Exhibit A of Applicant’s Motion for Leave to Amend Answer to Notice of Opposition (TTABVUE Doc. No. 41) (“Counterclaim”) as follows:

1. Opposer admits that the records of the United States Patent and Trademark Office reflect that Trademark Application Ser. No. 87/385,665, for registration of “ROCKET MESH” in International Class 28 for “Lacrosse balls; Lacrosse sticks” was filed March 25, 2017. Opposer lacks knowledge or information sufficient to determine the truth of whether “counterclaimant” filed said Trademark Application, and therefore Opposer denies this allegation and all remaining allegations set forth in Paragraph 1 of the Counterclaim.

2. Opposer lacks knowledge or information sufficient to determine the truth of the allegations set forth in Paragraph 2 of the Counterclaim, and therefore denies them.
3. Opposer admits that “Opposition No. 91237356 to oppose registration of the ROCKET MESH Mark” was filed October 21, 2017. The remaining allegations set forth in Paragraph 3 of the Counterclaim are both inaccurate and incomplete in describing the basis for filing Opposition No. 91237356, and therefore Opposer denies these and all remaining allegations set forth in Paragraph 3 of the Counterclaim.
4. Opposer denies the allegations set forth in Paragraph 4 of the Counterclaim.
5. Opposer denies the allegations set forth in Paragraph 5 of the Counterclaim.
6. Opposer admits that United States Trademark Reg. No. 5,297,623 issued on September 26, 2017 for the registration of “ROCKET SPORTS” for “Marketing services for the sports equipment of others; marketing services in the field of sports equipment; marketing services, namely, promoting or advertising the goods and services of others; marketing, promotional and advertising services provided by mobile telephone connections; marketing, advertising, and promoting the retail goods and services of others through wireless electronic devices; promoting and marketing the goods and services of others by distributing advertising material, coupons and discount offers via text messages; promoting and marketing the goods and

services of others by websites and social media; promoting the goods and services of others by means of word-of-mouth and nontraditional marketing programs; promoting the sale of goods and services of others by websites and social media; advertising and marketing services, namely, promoting the goods and services of others; advertising, marketing, and promoting the goods and services of others via websites and social media; on-line advertising and marketing services; providing marketing services for the sports equipment industry; reseller services, namely, distributorship services in the field of sports equipment,” said registration stating a date of first use in commerce of January 10, 2017. Opposer denies all remaining allegations set forth in Paragraph 6 of the Counterclaim.

7. Opposer denies the allegations set forth in Paragraph 7 of the Counterclaim.
8. Opposer denies the allegations set forth in Paragraph 8, subparagraph 8(a), subparagraph 8(b), subparagraph 8(c), subparagraph 8(d), the entirety of subparagraph 8(e), subparagraph 8(f), subparagraph 8(g), subparagraph 8(h), subparagraph 8(i), and subparagraph 8(j) of the Counterclaim. Opposer denies all remaining allegations set forth in Paragraph 8 of the Counterclaim.
9. Opposer denies the allegations set forth in Paragraph 9, the entirety of subparagraph 9(a), and subparagraph 9(b) of the Counterclaim. Opposer denies all remaining allegations set forth in Paragraph 9 of the Counterclaim.

Opposer denies any and all other allegations in the Counterclaim not already addressed in the answers shown in Paragraphs 1 through 9 above.

WHEREFORE, Opposer respectfully requests that this Board find in favor of Opposer, deny and dismiss with prejudice the Applicant's Counterclaim, and refuse registration for Applicant's Trademark Application, Ser. No. 87/385,665, for registration of the "ROCKET MESH" mark.

Dated: May 20, 2020

Respectfully Submitted,

/Paul W. Koda/ _____
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this 20th day of May, 2020, a copy of this OPPOSER'S ANSWER TO COUNTERCLAIM IN APPLICANT'S AMENDED ANSWER TO OPPOSER'S AMENDED NOTICE OF OPPOSITION was sent by electronic mail at rkl@rkllpatlaw.com to:

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