

ESTTA Tracking number: **ESTTA873777**

Filing date: **01/29/2018**

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

Proceeding	91238527
Party	Defendant Kingsley Consulting, LLC
Correspondence Address	MICHAEL A. MARRERO ULMER & BERNE LLP 600 VINE STREET SUITE 2800 CINCINNATI, OH 45202-2409 Email: mmarrero@ulmer.com
Submission	Answer
Filer's Name	Michael A. Marrero
Filer's email	mmarrero@ulmer.com, jbenett@ulmer.com
Signature	/Michael A. Marrero/
Date	01/29/2018
Attachments	ENTREPRENEUR answer.pdf(354198 bytes)

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

ENTREPRENEUR MEDIA, INC.

Opposer,

v.

KINGSLEY CONSULTING, LLC

Applicant.

Opposition No. 91238527
Serial No. 87/132,652

**ANSWER TO NOTICE OF
OPPOSITION**

Applicant Kingsley Consulting, LLC ("Applicant"), for its answer to the notice of opposition of Entrepreneur Media, Inc. ("Beats Electronics"), states:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of the paragraph preceding the first numbered paragraph. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1 and therefore denies them.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2 and therefore denies them.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3 and therefore denies them.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 4 and therefore denies them.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5 and therefore denies them.
6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 6 and its subparagraphs and therefore denies them.

7. Applicant admits the allegations of paragraph 7.
8. Applicant denies the allegations of paragraph 8.
9. Applicant denies the allegations of paragraph 9.

RELIEF REQUESTED

WHEREFORE, Applicant respectfully requests that the notice of opposition be rejected and that Applicant's mark be allowed to proceed to registration.

Respectfully submitted,

Dated: January 29, 2018

/s/ John F. Bennett

John F. Bennett
Michael A. Marrero
ULMER & BERNE LLP
600 Vine Street, Suite 2800
Cincinnati, Ohio 45202-2409
Telephone: (513) 698-5000
Facsimile: (513) 698-5079
jbennett@ulmer.com
mmarrero@ulmer.com

ATTORNEYS FOR APPLICANT KINGSLEY
CONSULTING, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing has been served on opposing counsel by mailing said copy on January 29, 2018, by First Class Mail, postage prepaid, to:

Patrick Justman Esq.
Latham & Watkins LLP
1260 High Bluff Drive
San Diego, California 92130

/s/ Michael A. Marrero

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this submission (along with any paper referred to as being attached or enclosed) is being filed with the United States Patent and Trademark Office via the Electronic System for Trademark Trials and Appeals on this 29th day of January 29, 2018.

/s/ Michael A. Marrero