

ESTTA Tracking number: **ESTTA907058**

Filing date: **07/02/2018**

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

Proceeding	91240948
Party	Defendant Shenzhen Unite-Fortune Development Co., Ltd.
Correspondence Address	SHENZHEN I & I PROPERTY CONSULTANT FIRM 518036 SHENZHEN SHENZHEN, 518026 CHINA Email: szfazhi@126.com, misswuye@qq.com, ustms@hotmail.com, info@siipa.com
Submission	Answer
Filer's Name	ZhenRen Zou
Filer's email	ustms@hotmail.com, info@siipa.com
Signature	/ZhenRen Zou/
Date	07/02/2018
Attachments	Answer.pdf(239138 bytes)

ANSWER

Shenzhen Unite-Fortune Development Co., Ltd., Applicant, hereby and through undersigned counsel, and files its Answer and Affirmative Defenses, and in support hereof states:

1. Applicant admits the allegations contained in Paragraphs 2,3, 5,6.
2. Applicant denies the allegations contained in Paragraphs 11, 12, 13, 14,15,16,17 and demands strict proof thereof at trial.
3. Applicant is without sufficient knowledge to admit or deny the allegations contained in Paragraphs 1,4,7,8,9,10

AFFIRMATIVE DEFENSES

1. The overall commercial impression between the marks differs.
2. The goods covered by Applicant's marks are different than those of Opposer.
3. The channels of trade between the marks will differ.
4. Opposer fails to use the trademark symbol on much of its advertising.
5. Applicant reserves the right to assert further affirmative defenses as discovery proceeds.

Dated: June 10, 2018

Respectfully submitted

/ ZhenRen Zou/

Vice President

Shenzhen Unite-Fortune Development Co., Ltd.

ustms@hotmail.com; info@siipa.com

Tel: 15110177800

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing has been served on ROETZEL & ANDRESS LPA by serving a copy by email to: leverett@ralaw.com, tlink@ralaw.com this 10 day of June, 2018.

/ ZhenRen Zou/

Vice President

Shenzhen Unite-Fortune Development Co., Ltd.

ustms@hotmail.com; info@siipa.com

Tel: 15110177800

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion is being submitted electronically through the electronically system for the Trademark Trial and Appeal Board ("ESTTA) and by email again at _leverett@ralaw.com, tlink@ralaw on this 2 day of July , 2018

/ ZhenRen Zou/

Vice President

Shenzhen Unite-Fortune Development Co., Ltd.

ustms@hotmail.com; info@siipa.com

Tel: 15110177800