

ESTTA Tracking number: **ESTTA974393**

Filing date: **05/16/2019**

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

Proceeding	91246232
Party	Defendant FAIR OBSERVER LLC
Correspondence Address	MICHAEL J BEVILACQUA WILMER CUTLER PICKERING HALE AND DORR LLP 60 STATE STREET BOSTON, MA 02109 UNITED STATES barbara.barakat@wilmerhale.com, michael.bevilacqua@wilmerhale.com, whiptrademark@wilmerhale.com 617-526-6000
Submission	Answer
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Date	05/16/2019
Attachments	fair observer answer 91246232.pdf(92275 bytes)

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

_____)	
United States Department of Homeland Security,)	
)	
Opposer)	
)	
v.)	Opposition No. 91246232
)	
Fair Observer LLC,)	
)	
Applicant)	
_____)	

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER TO NOTICE OF OPPOSITION

Sir:

Applicant, Fair Observer LLC, by and through its attorneys, hereby responds to the Notice of Opposition filed by U.S. Department of Homeland Security as follows:

1. Applicant is without sufficient knowledge or information to form a conclusion as to the truth of the allegations in Paragraph 1 and therefore, denies them.
2. Applicant admits that the allegations in Paragraph 2 are corroborated by the online records in the USPTO database. If there are any remaining allegations contained in Paragraph 2, Applicant denies them.
3. Applicant submits that there are no allegations to admit or deny in Paragraph 3. If there are any allegations in Paragraph 3, Applicant denies them.

4. Applicant is without sufficient knowledge or information to form a conclusion as to the truth of the allegations in Paragraph 4 and therefore, denies them.

5. Applicant denies the allegations contained in Paragraph 5.

6. Applicant admits the allegations contained in Paragraph 6.

7. Applicant denies each and every allegation contained in Paragraph 7.

8. Applicant denies each and every allegation contained in Paragraph 8.

9. Applicant denies each and every allegation contained in Paragraph 9.

10. Applicant denies each and every allegation contained in Paragraph 10.

Wherefore, Applicant prays that Opposer's Notice of Opposition be dismissed, and that judgement be entered in favor of Applicant Fair Observer LLC.

Respectfully submitted,

/barbara a. barakat/

Date: May 16, 2019

Michael J. Bevilacqua, Esq.
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CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing ANSWER TO NOTICE OF OPPOSITION was served this 16th day of Maye 2019, upon:

Joseph Hsiao, Esq.
Office of the General Counsel
Department of Homeland Security
245 Murray Lane, Mail Stop 0205
Washington, D.C. 20528

by email to Joseph.Hsiao@hq.dhs.gov.

/barbara a. barakat/

Barbara A. Barakat