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

Proceeding	91249565
Party	Defendant NAZ Holdings, LLC
Correspondence Address	STEVEN J. LAUREANTI SPENCER FANE LLP 2415 E. CAMELBACK ROAD, SUITE 600 PHOENIX, AZ 85016 slaureanti@spencerfane.com no phone number provided
Submission	Answer
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Date	08/26/2019
Attachments	19-08-26_0072_Answer_to_Notice_of_Opposition.pdf(134703 bytes)

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

VILLANOVA UNIVERSITY

Opposer,

vs.

NAZ HOLDINGS, LLC

Applicant.

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Opposition No. 91249565

Mark:



Serial No. 88/186,910

ANSWER TO NOTICE OF OPPOSITION

COMES NOW Applicant NAZ Holdings, LLC (“Applicant”) and for its answer to the Notice of Opposition filed by Villanova University (“Opposer”) states as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 1 of the Notice of Opposition as to whether a men’s basketball team can be categorized as highly competitive by winning only two NCAA championships since 1842 and accordingly denies the same. Applicant is without knowledge or information sufficient to form a belief as to the remaining allegations set forth in paragraph 1 of the Notice of Opposition and accordingly denies the same.

2. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 2 of the Notice of Opposition and accordingly denies the same.

3. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 3 of the Notice of Opposition and accordingly denies the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 4 of the Notice of Opposition and accordingly denies the same.
5. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 5 of the Notice of Opposition and accordingly denies the same.
6. Applicant is without knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 6 of the Notice of Opposition and accordingly denies the same.

7. Applicant admits that it filed Application No. 88/186,910 on November 8, 2018 to register



for “Hoodies; Jackets; Shirts; Sweatshirts; Long-sleeved shirts; Polo shirts; T-shirts” in Class 25. Applicant further states that Application No. 88/186,910 and the information from the electronic database records of the U.S. Patent and Trademark Office (“USPTO”) speak for themselves. Applicant denies it filed Application No. 88/186,910 on November 12, 2018.

8. Applicant denies the allegations in paragraph 8 of the Notice of Opposition.
9. Applicant denies the allegations in paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations in paragraph 10 of the Notice of Opposition.

11. Applicant denies the allegations in paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations in paragraph 12 of the Notice of Opposition.

WHEREFORE, Applicant prays that the Board dismiss Opposer's Notice of Opposition with prejudice, that the Board enter judgment in favor of Applicant and against Opposer, and for such other relief as the Board deems just and proper.

Respectfully submitted,

/Steven J. Laureanti/

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing ANSWER TO NOTICE OF OPPOSITION was served via email on this 26th day of August, 2019 upon:

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