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

Proceeding	91253335
Party	Defendant Shenzhen Relx Technology Co., Ltd.
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Submission	Answer
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Date	02/17/2020
Attachments	Answer to Opposition - RELXI RELXNANO RELXPOD - Opp No 91253335 - 021720.pdf(20476 bytes)

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

RELX Group PLC,

Opposer,

v.

Shenzhen Relx Technology Co., LTD.,

Applicant.

Opposition No.: 91253335

Appl. Serial Nos.: 88/597,948, 88/597,966,
and 88/597,939

Marks: RELXNANO, RELXPOD, RELXI

Published for Opposition: November 19,
2019, November 26, 2019.

APPLICANT'S ANSWER TO OPPOSER'S NOTICE OF OPPOSITION

Shenzhen Relx Technology Co., LTD. ("Applicant"), by and through its undersigned counsel, submits the following answer and affirmative defenses to RELX Group PLC's ("Opposer") Notice of Opposition. Applicant denies each and every allegation by Opposer not expressly admitted herein.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 1 and therefore denies them.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 2 and therefore denies them.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 3 and therefore denies them.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 4 and therefore denies them.

5. Applicant avers that the document attached as Exhibit A speaks for itself. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in Paragraph 5 and therefore denies them.

6. Paragraph 6 calls for a legal conclusion and no answer is required. To the extent that Paragraph 6 contains factual allegations requiring a response, Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 6 and therefore denies them.

7. Applicant denies the allegations and characterizations in Paragraph 7.

8. Applicant admits that it filed Application Serial No. 88/597,948 for RELXNANO, Application Serial No. 88/597,966 for RELXPOD, and Application Serial No. 88/597,948 for RELXI. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in Paragraph 8 and therefore denies them.

9. Applicant admits that it filed Application Serial No. 88/597,948 for RELXNANO, Application Serial No. 88/597,966 for RELXPOD, and Application Serial No. 88/597,948 for RELXI on August 29, 2019. Applicant lacks knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in Paragraph 9 and therefore denies them.

10. Applicant denies the allegations and characterizations in Paragraph 10.

11. Applicant admits the allegations and characterizations in Paragraph 11.

12. Applicant admits the allegations and characterizations in Paragraph 12.

13. Applicant denies the allegations and characterizations in Paragraph 13.

COUNT I

LIKELIHOOD OF CONFUSION

14. Applicant repeats and re-alleges each and every allegation and/or response set forth in the foregoing paragraphs as if fully set forth herein.

15. Applicant denies the allegations and characterizations in Paragraph 15.

COUNT II

TRADEMARK DILUTION

16. Applicant repeats and re-alleges each and every allegation and/or response set forth in the foregoing paragraphs as if fully set forth herein.

17. Applicant denies the allegations and characterizations in Paragraph 17.

18. Applicant admits that it filed Application Serial No. 88/597,948 for RELXNANO, Application Serial No. 88/597,966 for RELXPOD, and Application Serial No. 88/597,948 for RELXI, and denies the remaining allegations and characterizations in Paragraph 18.

19. Applicant denies the allegations and characterizations in Paragraph 19.

DEFENSES

Pleading further, and without waiving the above answer, Applicant reserves the right to assert any and all affirmative defenses, which may become appropriate during discovery.

PRAYER FOR RELIEF

Applicant requests that the opposition be dismissed and that Applicant's RELXNANO, RELXPOD, and RELXI marks proceed to registration.

Respectfully submitted,

Dated this 17th day of February, 2020.

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/Pam K. Jacobson/

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CERTIFICATE OF SERVICE

I, Michael W. Meredith, hereby certify that on this 17th day of February, 2020, I caused the foregoing to be served electronically on the following, at the addresses listed as follows:

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/s/ Michael W. Meredith
Michael W. Meredith