

ESTTA Tracking number: **ESTTA1035260**

Filing date: **02/12/2020**

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

Proceeding	91253346
Party	Defendant New Jersey Teamsters Football Club
Correspondence Address	NEW JERSEY TEAMSTERS FOOTBALL CLUB NEW JERSEY TEAMSTERS FOOTBALL CLUB 63 W. 30TH STREET #102 BAYONNE, NJ 07002 Marketing@NJTeamstersFC.com, sistowe@gmail.com, info@njteamstersfc.com no phone number provided
Submission	Answer
Filer's Name	Anthony M. Verna III
Filer's email	anthony@vernalaw.com
Signature	/s Anthony M. Verna III s/
Date	02/12/2020
Attachments	answer - NJ Teamsters FC.pdf(124673 bytes )

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

International Brotherhood of Teamsters	)	Opposition No.: 91253346
	)	
Plaintiff,	)	
vs.	)	
	)	
New Jersey Teamsters Football Club	)	
	)	
Defendant	)	
	)	
	)	
	)	
	)	
	)	

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**ANSWER**

New Jersey Teamsters Football Club (“Defendant” or “Applicant”), through its attorney, Anthony M. Verna III, hereby answers the Notice of Opposition that International Brotherhood of Teamsters (“Plaintiff” or “Opposer”) filed as follows:

1. Applicant does not have enough information to either admit or deny the averments of this paragraph.
2. Applicant does not have enough information to either admit or deny the averments of this paragraph.
3. Applicant does not have enough information to either admit or deny the averments of this paragraph.
4. Applicant does not have enough information to either admit or deny the averments of this paragraph.
5. Applicant does not have enough information to either admit or deny the averments of this paragraph.
6. Applicant does not have enough information to either admit or deny the averments of this paragraph.
7. Applicant does not have enough information to either admit or deny the averments of this paragraph.
8. Applicant does not have enough information to either admit or deny the averments of this paragraph.
9. Applicant does not have enough information to either admit or deny the averments of this paragraph.

10. Applicant does not have enough information to either admit or deny the averments of this paragraph.
11. Applicant does not have enough information to either admit or deny the averments of this paragraph.
12. Applicant does not have enough information to either admit or deny the averments of this paragraph.
13. Applicant does not have enough information to either admit or deny the averments of this paragraph.
14. Applicant admits the averments of this paragraph.
15. Applicant admits the averments of this paragraph.
16. Applicant does not have enough information to either admit or deny the averments of this paragraph.
17. Applicant repeats all answers in paragraphs 1-16 as if they were separately pleaded here.
18. Applicant does not have enough information to either admit or deny the averments of this paragraph.
19. Applicant denies the averments of this paragraph.
20. Applicant denies the averments of this paragraph.
21. Applicant denies the averments of this paragraph.
22. Applicant denies the averments of this paragraph.
23. Applicant denies the averments of this paragraph.
24. Applicant repeats all answers in paragraphs 1-23 as if they were separately pleaded here.
25. Applicant denies the averments of this paragraph.
26. Applicant denies the averments of this paragraph.
27. Applicant denies the averments of this paragraph.
28. Applicant denies the averments of this paragraph.

### **Amplifications**

29. Applicant's mark is spelled differently than Opposer's marks.
30. Applicant's mark is pronounced differently than Opposer's marks.

31. Applicant's mark leaves a radically different commercial impression than Petitioner's marks.
32. The goods/services Applicant's mark represents are not economically related to the goods/services Opposer's marks represent.

Wherefore, New Jersey Teamsters Football Club requests that the opposition to U.S. Serial Number, 88337182, NJ TEAMSTERS FC, be denied and the mark continue to registration.

Dated: February 12, 2020

/s Anthony M. Verna III  
Anthony M. Verna III, Esq.  
Verna Law, P.C.  
80 Theodore Fremd Dr.  
Rye, NY 10580

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New Jersey Teamsters Football Club	)	
	)	
Defendant	)	
	)	
	)	
	)	
	)	

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 12<sup>th</sup> day of February 2020, a copy of the foregoing Appearance was served via e-mail on the following representative:

Gabrielle S. Roth  
Sughrue Mion, PLLC  
2000 Pennsylvania Ave NW,  
Washington, DC 20006  
tm@sughrue.com, groth@sughrue.com, kdunmire@sughrue.com

Respectfully submitted,

Dated this February 12, 2020

/s/ Anthony M. Verna III  
Anthony M. Verna III, Esq.  
Verna Law, P.C.  
80 Theodore Fremd Dr.  
Rye, NY 10580