

ESTTA Tracking number: **ESTTA1049059**

Filing date: **04/14/2020**

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

|                        |   |
|------------------------|---|
| Proceeding             | 91254474  |
| Party                  | Defendant<br>Siemens Mobility, Inc.   |
| Correspondence Address | MARIE ANNE MASTROVITO<br>ABELMAN FRAYNE & SCHWAB<br>666 THIRD AVENUE<br>NEW YORK, NY 10017-5612<br>MAMastrovito@lawabel.com, docket@lawabel.com<br>no phone number provided |
| Submission             | Answer  |
| Filer's Name           | Marie Anne Mastrovito   |
| Filer's email          | mamastrovito@lawafs.com   |
| Signature              | /MAMastrovito/  |
| Date                   | 04/14/2020  |
| Attachments            | VENTURE ANSWER TO NOTICE OF OPPOSITION.pdf(37696 bytes )  |

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

In the Matter Of: Trademark Serial No.: 88475771 for the mark VENTURE;  
Published, February 4, 2020

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|---|--------------------------------|
| <p>Venturi Automobiles,<br/><br/>Opposer<br/><br/>v.<br/><br/>Siemens Mobility, Inc.,<br/><br/>Applicant.</p> | <p>Opposition No. 91254474</p> |
|---|--------------------------------|

Applicant, Siemens Mobility Inc., responds to the Opposition filed by Opposer, Venturi Automobiles as follows:

1. Applicant is without knowledge or information sufficient to admit or deny the allegations in paragraph 1 of the Notice of Opposition and therefore denies same.
2. Applicant denies the allegations in paragraph 2 of the Notice of Opposition.
3. Applicant is without knowledge or information sufficient to admit or deny the allegations in paragraph 3 of the Notice of Opposition and therefore denies same.
4. Applicant is without knowledge or information sufficient to admit or deny the allegations in paragraph 4 of the Notice of Opposition and therefore denies same.
5. Applicant denies the allegations in paragraph 5 of the Notice of Opposition.
6. Applicant denies the allegations in paragraph 6 of the Notice of Opposition.
7. Applicant denies the allegations in paragraph 7 of the Notice of Opposition.
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.

WHEREFORE, APPLICANT requests that the Notice of Opposition be denied.

Respectfully submitted,

/MAMastrovito/  
By: Marie Anne Mastrovito

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Certificate of Service

The undersigned hereby certifies that the foregoing Answer to Notice of Opposition was served on counsel for Opposer's this 14th day of April, 2020, at the email address below:

nwells@legendslaw.com

/MAMastrovito/