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

Proceeding	91255042
Party	Defendant SHENZHEN RELX TECHNOLOGY CO., LTD.
Correspondence Address	HUI ZHANG RABIN & BERDO, PC 1101 14TH STREET, N.W. SUITE 500 WASHINGTON, DC 20005 firm@rabinberdo.com no phone number provided
Submission	Answer
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Date	05/11/2020
Attachments	2020-05-11 Answer -RELXME - Opp No 91255042.pdf(71913 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.: 91255042

Appl. Serial No.: 88/592,461

Marks: RELXME

Published for Opposition: February 18, 2020

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 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 denies the allegations in Paragraph 4.
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 denies them.

7. Paragraph 7 calls for a legal conclusion and no answer is required. To the extent that Paragraph 7 contains factual allegations requiring a response, Applicant denies them.

8. Applicant admits that it filed Application Serial No. 88/592,461 for RELXME on August 26, 2019. Applicant denies the remaining allegations in Paragraph 8.

9. Applicant admits that it filed Application Serial No. 88/592,461 for RELXME on August 26, 2019. Applicant denies the remaining allegations in Paragraph 9.

10. Applicant denies the allegations in Paragraph 10.

11. Applicant admits the allegations in Paragraph 11.

12. Applicant admits the allegations in Paragraph 12.

13. Applicant avers that its Application speaks for itself and denies the remaining allegations 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 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 in Paragraph 17.

18. Applicant denies the allegations in Paragraph 18.

19. Applicant denies the allegations 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 RELXME mark proceed to registration.

Respectfully submitted,

Dated this 11th day of May, 2020.

K&L GATES LLP

/Pam K. Jacobson/

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Attorney for the Applicant

CERTIFICATE OF SERVICE

I, Grace E. Carlson, hereby certify that on this 11th day of May, 2020, I caused the foregoing to be served electronically on the following, at the addresses listed as follows:

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/s/ Grace E. Carlson _____
Grace E. Carlson