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Filing date: **05/29/2020**

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

Proceeding	91255424
Party	Defendant LaQueta Rena Hatton
Correspondence Address	KEESONGA GORE MINOTT GORE, P.A. 201 S. BISCAYNE BLVD. SUITE 2800 MIAMI, FL 33131 admin@minottgore.com no phone number provided
Submission	Answer
Filer's Name	Keesonga Gore
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Signature	/kg/
Date	05/29/2020
Attachments	Arise to Greatness Answer.pdf(86622 bytes )

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

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<b>LINKING HUMAN SYSTEMS LLC,</b>	:	
<b>Opposer,</b>	:	
v.	:	<b>Opposition No. 91255424</b>
	:	
<b>LAQUETA RENA HATTON,</b>	:	
<b>Applicant.</b>	:	

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**APPLICANT’S ANSWER TO OPPOSITION**

Applicant, LaQueta Rena Hatton, through her attorneys, hereby answers to the allegations set forth in the Notice of Opposition as follows:

1. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 1 and, therefore, denies said allegations.
2. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 2 and, therefore, denies said allegations.
3. Applicant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 3 and, therefore, denies said allegations.
4. Admitted.
5. Denied.

**AFFIRMATIVE DEFENSES**

1. Opposer’s claims are barred in whole or in part for failure to state a claim upon which relief may be granted.
2. Opposer’s claims have been brought in bad faith and for illegitimate purposes.
3. Opposer’s claims are barred in whole or in part by the doctrine of acquiescence.
4. Opposer’s claims are barred in whole or in part by the doctrine of equitable estoppel.
5. Opposer’s claims are barred in whole or in part by the doctrine of unclean hands.

6. Applicant reserves the right to amend its Answer should discovery bring forth new facts and evidence upon which to assert additional affirmative defenses.

**WHEREFORE**, Applicant respectfully requests that the Notice of Opposition be dismissed and/or denied in its entirety, Applicant's proposed mark in Application Serial No. 88/686,394 be permitted registration in the United States Patent and Trademark Office, and that the Applicant be granted such other and further relief as the Board deems just and proper.

Dated: **May 29, 2020**

Respectfully submitted,

BY           /Keesonga Gore/          

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*Attorneys for Applicant*

Encl: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent, via email, to Kirstin M. Jahn, Esq., at [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com), Jahn & Associates, 1942 Broadway, Suite 314, Boulder, CO 80302, on this 29th day of May, 2020.

          /Keesonga Gore/            
Keesonga Gore