

ESTTA Tracking number: **ESTTA1078516**

Filing date: **08/30/2020**

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

Proceeding	91256517
Party	Defendant Licensing International, Inc.
Correspondence Address	EDMUND J. FERDINAND, III FERDINAND IP, LLC 1221 POST ROAD EAST SUITE 302 WESTPORT, CT 06880 UNITED STATES Primary Email: jferdinand@24iplg.com Secondary Email(s): klewertoff@ferdinandip.com , annam@24iplg.com , betha@24iplg.com No phone number provided.
Submission	Answer
Filer's Name	Edmund J. Ferdinand, III
Filer's email	jferdinand@FIPLawGroup.com , lauras@FIPLawGroup.com
Signature	/ejf/
Date	08/30/2020
Attachments	Answer to Notice of Opposition.pdf(70888 bytes)

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

In the Matter of Trademark Application Serial No. 88/562,893

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Licensing Executives Society	:	Opposition No. 91/256,517
International, Inc.,	:	
	:	
Opposer,	:	
	:	
v.	:	
	:	
Licensing International, Inc.	:	
	:	
Applicant.	:	
-----X		

ANSWER TO NOTICE OF OPPOSITION

Applicant, Licensing International, Inc. (“Applicant”), by and through undersigned counsel, as and for its Answer to the Notice of Opposition filed by Licensing Executives Society International, Inc. (“Opposer”) respectfully alleges as follows, with each numbered paragraph corresponding to the numbered paragraphs of the Notice of Opposition. Unless expressly admitted, Applicant denies the allegations and characterizations of the Notice of Opposition.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Notice of Opposition and, on that basis, denies them.

2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and, on that basis, denies them.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Notice of Opposition and, on that basis, denies them.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Notice of Opposition and, on that basis, denies them.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Notice of Opposition and, on that basis, denies them.

6. Applicant admits only that it filed U.S. Federal Trademark Application Serial No. 88/562,893 on August 2, 2019 and that the contents of the application speaks for itself, and denies the remaining allegations contained in Paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegations contained in Paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations contained in Paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations contained in Paragraph 9 of the Notice of Opposition

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed with prejudice, together with such other and further relief that the Board deems just and proper.

Dated: August 30, 2020

THE APPLICANT,

By: /s/Edmund J. Ferdinand, III
Edmund J. Ferdinand, III, Esq.
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CERTIFICATE OF SERVICE AND FILING

This certifies that a copy of the foregoing Answer to Notice of Opposition was served on the Opposer on the date indicated below by operation of the Trademark Trial and Appeal Board's electronic filing system:

[EMILY T. KAPPERS](#), ESQ.
HOWARD S. MICHAEL, ESQ.
BRINKS GILSON & LIONE
P.O. BOX 10395
CHICAGO, IL 60610
UNITED STATES

and further certifies that the aforementioned Answer was filed with the Trademark Trial and Appeal Board on the date indicated below via the Board's online electronic filing system.

Dated: August 30, 2020

/s/Edmund J. Ferdinand, III
Edmund J. Ferdinand, III