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

Proceeding	91263877
Party	Defendant Fu-Chang Hsu
Correspondence Address	OTTO O. LEE INTELLECTUAL PROPERTY LAW GROUP LLP 1871 THE ALAMEDA, SUITE 250 SAN JOSE, CA 95126 UNITED STATES Primary Email: tm_docket@iplg.com 408-286-8933
Submission	Answer
Filer's Name	Kevin Viau
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Date	04/19/2021
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,

Opposer,

v.

FU-CHANG HSU,

Applicant.

Mark: X-NAND

Opposition No.: 91263877

Serial No.: 88540624

**APPLICANT'S ANSWER TO NOTICE OF
OPPOSITION**

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER

Applicant Fu-Chang Hsu ("Hsu") hereby answers the Notice of Opposition filed by Opposer Micron Technology, Inc. ("Micron") as follows.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1, and accordingly denies the allegations contained therein.
2. Applicant admits the allegations of Paragraph 2.
3. Applicant admits the allegations of Paragraph 3.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4, and accordingly denies the allegations contained therein.
5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5, and accordingly denies the allegations contained therein.
6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6, and accordingly denies the allegations contained therein.

7. Applicant admits the allegations of Paragraph 7.
8. Applicant admits the allegations of Paragraph 8.
9. Applicant admits the allegations of Paragraph 9.
10. Applicant denies the allegations of Paragraph 10.
11. Applicant denies the allegations of Paragraph 11.
12. Applicant denies the allegations of Paragraph 12.
13. Applicant denies each and every allegation of the Notice of Opposition not

heretofore specifically admitted, denied, or otherwise controverted, and specifically denies that the mark shown in App. Serial No. 88540624 is descriptive and that Opposer will be damaged by registration of the said mark.

WHEREFORE, Applicant prays that the Notice of Opposition be denied and dismissed with prejudice, that Application Serial No. 88540624 be permitted to proceed toward registration on the Principal Register, and for such other and further relief as the Board deems just and proper.

Dated: April 19, 2021

By: /Kevin Viau/
Otto O. Lee
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to this action. I am employed in the County of Santa Clara, California, and my business address is 1871 The Alameda, Suite 250, San Jose, California 95126.

I hereby certify that on April 19, 2021, I served the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION** on Opposer via email by sending the document to the person(s) at the email addresses listed below.

MARGARET NIVER MCGANN
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Attorneys for Opposer

Dated: April 19, 2021

By: /Kevin Viau/
Kevin Viau