

ESTTA Tracking number: **ESTTA1148621**

Filing date: **07/22/2021**

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

Proceeding	91265968
Party	Defendant Bigfoot Ventures LLC
Correspondence Address	MICHAEL GLEISSNER 4 TAYLOR STREET MILLBURN, NJ 07041 UNITED STATES Primary Email: mgleiss@bigfoot.com No phone number provided.
Submission	Answer
Filer's Name	Michael Gleissner
Filer's email	mg@bigfoot.com
Signature	/Michael Gleissner/
Date	07/22/2021
Attachments	USPTO - TTAB 91265968 - NEXUS RADIO - Answer.pdf(194300 bytes) USPTO - TTAB 91265968 - NEXUS RADIO - Certificate of Service - Answer .pdf(143144 bytes)

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

NEXUS DIGITAL LLC
Opposer

Opposition No. 91265968

v.

Mark:

Bigfoot Ventures LLC
Applicant

NEXUS

APPLICANT’S ANSWER TO
OPPOSITION

In the opposition proceedings above initiated by Nexus Digital LLC (“Opposer”) v. Bigfoot Ventures LLC (“Applicant”), Applicant answers Opposer’s Opposition as following:

1. Answering Paragraph 1 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

2. Answering Paragraph 2 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

3. Answering Paragraph 3 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

4. Answering Paragraph 3 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

5. Answering Paragraph 3 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

6. Answering Paragraph 3 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

7. Answering Paragraph 8 of the Opposition, Applicant believes, to the best of Applicant's recollection, the facts stated therein to be accurate.

8. Answering Paragraph 8 of the Opposition, paragraph calls for a legal conclusion, not a response. Insofar as the conclusions, assertions and claims are implied, Applicant denies the same.

9. Answering Paragraph 3 of the Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein, and accordingly denies the same.

10. Answering Paragraph 8 of the Opposition, paragraph calls for a legal conclusion, not a response. Insofar as the conclusions, assertions and claims are implied, Applicant denies the same.

11. Answering Paragraph 8 of the Opposition, paragraph calls for a legal conclusion, not a response. Insofar as the conclusions, assertions and claims are implied, Applicant denies the same.

12. Answering Paragraph 8 of the Opposition, paragraph calls for a legal conclusion, not a response. Insofar as the conclusions, assertions and claims are implied, Applicant denies the same.

AFFIRMATIVE DEFENSES

Mark: Nexus
Reg. No.: 91265968

Page 3

Applicant reserves the right to rely on such other and further defenses as may be supported by facts to be determined through comprehensive discovery and to amend Applicant's answers accordingly to assert such defenses.

WHEREFORE, Applicant respectfully requests that the Trademark Trial and Appeal Board dismisses the subject Opposition.

Respectfully submitted,

July 22, 2021

Bigfoot Ventures LLC

By:
/Michael Gleissner/
Corporate Officer for Applicant

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

NEXUS DIGITAL LLC
Opposer

v.

Bigfoot Ventures LLC
Applicant

Opposition No. 91265968

Mark:

NEXUS

CERTIFICATE OF SERVICE

This is to certify that in accordance with Trademark Rule 37 C.F.R. § 2.119 and TBMP § 113, the foregoing was served via electronic mail to the email addresses to be the ones on record for Opposer on record and presently shown in the online access system known as TTABVUE, namely

gregory@nexus.radio

Certified on this July 22, 2021

Bigfoot Ventures LLC

By:
/Michael Gleissner/
Corporate Officer of Applicant