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Filing date: **01/25/2021**

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

Proceeding	91266257
Party	Defendant Khangri Sourcing
Correspondence Address	KRIS JENSEN JENSEN LEGAL 2775 HARBOR AVENUE SW, FLOOR 4 NANIQQ SEATTLE, WA 98126 UNITED STATES Primary Email: krisjensen@comcast.net 206-617-9173
Submission	Answer
Filer's Name	Kris Jensen
Filer's email	krisjensen@comcast.net, krisjensen@jensenlegal.com
Signature	/s/Kris Jensen
Date	01/25/2021
Attachments	Answer to Opposition at TTAB 91266257.pdf(123175 bytes)

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

NANI SWIMWEAR INC.,

Opposer,

vs.

KHANGRI SOURCING,

Applicant.

APPLICANT’S ANSWER TO
NOTICE OF OPPOSITION

Opposition No. **91266257**

Application No. **90015852**

TO:
USPTO
Trademark Trial and Appeal Board

AND TO:
Opposer, Nani Swimwear,
c/o their attorney herein

Applicant’s Answer to the Notice of Opposition

In response to the Notice of Opposition issued by the Board on 12/01/2020, the applicant, Khangri Sourcing, answers the opposition identified above as follows:

1. In response to the allegations of **paragraphs 1 and 2** of the Notice, applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation therein, and therefore denies the same.

2. In response to the allegations of **paragraph 3** of the Notice, the applicant admits.

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3. In response to the allegations of **paragraphs 4 and 5** of the Notice, the applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation therein, and therefore denies the same.

4. In response to the allegations of **paragraphs 6 and 7** of the Notice, the applicant admits.

5. In response to the allegations of **paragraphs 8 - 13** of the Notice, the applicant denies.

Relief Requested

WHEREFORE;

1. The applicant asks that this opposition proceeding be dismissed and that its registration issue forthwith.

Appointment of Counsel

Khangri Sourcing hereby appoints Kris R. Jensen, a member of the Bar of the State of Washington, with his offices listed below and herein, as its attorney, with full power of substitution and revocation, to defend this Opposition and to transact all business connected with this Opposition in the Patent and Trademark Office and the United States courts, to sign its name to all papers which may hereafter be filed in connection with said Opposition and to receive official communications relating to same.

Please direct all correspondence in this matter to Kris R. Jensen, to the contact information below.

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Respectfully,

DATED this January 25, 2021.

/s/Kris Jensen
Kris R. Jensen, WSBA # 19261
Attorney for Applicant
2775 Harbor Ave. SW, Floor 4, Suite D
Seattle, WA 98126
KrisJensen@JensenLegal.com
(206) 617-9173

CERTIFICATE OF FILING WITH ESTTA

I hereby certify that this paper together with any exhibits referenced therein were filed with the USPTO's ESTTA filing service on the date listed above.

/s/Kris Jensen
Kris Jensen

CERTIFICATE OF EMAILING TO PLAINTIFF/OPOSER

I hereby certify that this paper together with any exhibits referenced therein were emailed to the Plaintiff/Opposition party at this email address:

Email address: Preston@projectcip.com

/s/Kris Jensen
Kris Jensen