

ESTTA Tracking number: **ESTTA1132452**

Filing date: **05/10/2021**

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

| | |
|------------------------|---|
| Proceeding | 91268468 |
| Party | Defendant Global Trade Specialists, Inc. |
| Correspondence Address | ARNOLD S. WEINTRAUB THE WEINTRAUB GROUP 24901 NORTHWESTERN HIGHWAY, SUITE 311 SOUTHFIELD, MI 48075 UNITED STATES Primary Email: ipdocket@weintraubgroup.com Secondary Email(s): ipdocket@weintraubgroup.com 248-809-2005 |
| Submission | Answer |
| Filer's Name | Arnold S. Weintraub |
| Filer's email | ipdocket@weintraubgroup.com |
| Signature | /Arnold S. Weintraub/ |
| Date | 05/10/2021 |
| Attachments | 20210510 Answer to Opposition for Filing.pdf(79357 bytes) |

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

| | | |
|--|---|-------------------------|
| In the Matter of |) | |
| Application No. 88780729 |) | |
| |) | |
| MERCADO ELECTRONICO, S.A., |) | |
| |) | |
| Opposer, |) | |
| |) | Opposition No. 91268468 |
| v. |) | |
| |) | |
| GLOBAL TRADE SPECIALISTS, INC., |) | |
| |) | |
| Applicant. |) | |
| |) | |

ANSWER TO NOTICE OF OPPOSITION

NOW COMES Applicant, GLOBAL TRADE SPECIALISTS, INC., through its Counsel ARNOLD S. WEINTRAUB and THE WEINTRAUB GROUP, P.L.C., and for its Answer to this Notice of Opposition asserts as follows:

1. Applicant admits that the records of the USPTO reflect same.
2. Applicant admits that the records of the USPTO reflect same.
3. Applicant admits that the records of the USPTO reflect same.
4. Applicant admits Paragraph 4.
5. Applicant neither admits nor denies Paragraph 5 being without sufficient knowledge to form a belief to same and, therefore, leaves Opposer to its proofs. However, the records of the USPTO reflect same.
6. Applicant denies Paragraph 6 as untrue.
7. Applicant denies Paragraph 7 as untrue as to the conclusion.

WHEREFORE, Applicant prays that the Opposition be dismissed and that Applicant's Application, Serial No. 88/780,729 be passed to Registration.

Dated: May 10, 2021

Respectfully submitted,

By: /Arnold S. Weintraub/
Arnold S. Weintraub
The Weintraub Group, P.L.C.
24901 Northwestern Hwy., Suite 311
Southfield, Michigan 48075
Tel: 248-809-2005
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Attorneys for Applicant

AFFIRMATIVE DEFENSES

Now comes Applicant and for its Affirmative Defenses, asserts as follows:

1. Applicant reserves the right to set forth Affirmative Defenses as they may become available through discovery.

WHEREFORE, Applicant respectfully requests that this Opposition be dismissed, and Applicant's Application Serial No. 88/780,729 be passed to Registration.

Dated: May 10, 2021

Respectfully submitted,

By: /Arnold S. Weintraub/
Arnold S. Weintraub
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Attorneys for Applicant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Answer to Notice of Opposition and Affirmative Defenses was served upon Mr. Roy D. Gross, Attorney for Opposer by email to: roy@rgrosslaw.com

Dated: May 10, 2021

/Dede Phillips/

Dede Phillips
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