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

Proceeding	91268881
Party	Defendant Rollease Acmeda Inc.
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Date	12/13/2021
Attachments	ANSWER to Notice of Opposition re ARC 91268881.pdf(419285 bytes)

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

THE CHAMBERLAIN GROUP, INC.

Opposer,

v.

ROLLEASE ACMEDA INC.

Applicant.

Opposition No. 91268881

ANSWER

Applicant, Rollease Acmeda Inc., by and through counsel, answers the Notice of Opposition filed by Opposer, The Chamberlain Group, Inc., as follows, with each numbered paragraph below corresponding to the similarly numbered paragraph in the Notice of Opposition. Unless expressly admitted, all allegations in the Notice of Opposition are denied.

RESPONSES TO PLEADED ALLEGATIONS

Count I

1. Applicant admits only that it filed U.S. Serial No. 87982894 on March 15, 2017, and it refers to that application for its particulars and prosecution history.
 2. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.
 3. Applicant admits only that the Office identifies “The Chamberlain Group, Inc.” as the owner of U.S. Reg. No. 5697764 and refers to that registration for its particulars.
- The remaining allegations are argument, to which no response is required.

4. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.
5. Applicant admits only that the Office identifies “The Chamberlain Group, Inc.” as the owner of U.S. Reg. Nos. 4165481, 4638156 (cancelled), and 4666227 and refers to those registrations for their particulars. Applicant lacks sufficient information to admit or deny the remaining allegations, and therefore denies same.
6. The paragraph contains only argument, to which no response is required. It is also predicated on the false premise that Applicant would need Opposer’s “consent.”
7. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.
8. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.
9. The paragraph contains only argument, to which no response is required. It is also predicated on the false premise that Opposer’s ARQ mark is somehow relevant. Notwithstanding the above, Applicant affirmatively denies having any knowledge of Opposer's ARQ mark at the time Applicant filed Serial No. 87982894.
10. Applicant admits only that during prosecution of U.S. Serial No. 87982894 it claimed a date of first use in commerce of at least as early as July 12, 2017. The remaining allegations are only argument, to which no response is required.
11. The paragraph contains only argument, to which no response is required.
12. The paragraph contains only argument, to which no response is required.
13. The paragraph contains only argument, to which no response is required.
14. The paragraph contains only argument, to which no response is required.

15. The paragraph contains only argument, to which no response is required.

Count II

16. No separate response is required to this paragraph.

17. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.

18. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.

19. Applicant lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies same.

20. The paragraph contains only argument, to which no response is required.

21. The paragraph contains only argument, to which no response is required.

22. The paragraph contains only argument, to which no response is required.

WHEREFORE, Applicant, Rollease Acmeda Inc., prays that this opposition be dismissed and that the subject application be allowed to issue to registration. All communications regarding this opposition should be addressed as follows

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Respectfully submitted,

HUNTON ANDREWS KURTH LLP

Dated: December 13, 2021

By: /William M. Merone/
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Counsel for Applicant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Answer*, along with all supporting exhibits, was served on the counsel or parties indicated below on the date and in the manner indicated:

By Electronic Mail (Per Rule 2.119(b)(6))

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Dated: December 13, 2021

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