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Filing date: **09/28/2021**

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

| | |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proceeding | 91271152 |
| Party | Defendant MHO, LLC |
| Correspondence Address | LAURA T. GEYER VORYS, SATER, SEYMOUR AND PEASE LLP P.O. BOX 2255 IPLAW@VORYS COLUMBUS, OH 43216-2255 UNITED STATES Primary Email: iplaw@vorys.com Secondary Email(s): mjhoran@vorys.com 202-467-8800 |
| Submission | Answer |
| Filer's Name | Reed E. Fryar |
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| Signature | /Reed E. Fryar/ |
| Date | 09/28/2021 |
| Attachments | MHO LLC Answer - MYMIHOME Opposition 91271152.pdf(139948 bytes) |

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

In re Serial No. 90/356,205

Mark: MYMIHOME

Xiaomi Singapore Pte. Ltd., a Private Limited
Company Incorporated in Singapore,

Opposer,

v.

MHO, LLC, a Florida Limited Liability
Company,

Applicant

Opposition No. 91271152

ANSWER TO NOTICE OF OPPOSITION AND AFFIRMATIVE DEFENSE,

Applicant, MHO, LLC, answers the Notice of Opposition to Application Serial Number 90/356,205 (the “Application”) filed by Opposer, Xiaomi Singapore Pte. Ltd., as follows:

1. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 1 of the Opposition and therefore denies them.
2. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 2 of the Opposition and therefore denies them.
3. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 3 of the Opposition and therefore denies them.
4. Applicant admits that records for the cited registrations exist in the United States Patent and Trademark Office’s online database, but otherwise, Applicant has insufficient

knowledge and information to form a belief as to the truth of the allegations in paragraph 4 of the Opposition and therefore denies them.

5. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 5 of the Opposition and therefore denies them.

6. Applicant denies the allegations in paragraph 6 of the Opposition.

7. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 7 of the Opposition and therefore denies them.

8. Applicant has insufficient knowledge and information to form a belief as to the truth of the allegations in paragraph 8 of the Opposition and therefore denies them.

9. Applicant denies the allegations in paragraph 9 of the Opposition.

10. Admitted.

11. Admitted.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Admitted.

20. Admitted.

21. Denied.

22. Denied.

23. Denied.

AFFIRMATIVE DEFENSES

Lack of Standing

24. Applicant repeats and re-alleges Paragraphs 1 through 23.

25. Opposer lacks standing to bring this Opposition.

THEREFORE, Applicant prays that the Board dismiss this Notice of Opposition.

Respectfully submitted,

Date: September 28, 2021



William H. Oldach III

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Attorneys for Applicant

MHO, LLC

CERTIFICATE OF SERVICE

I, William H. Oldach III, hereby certify that a true and complete copy of the foregoing Answer and Affirmative Defense has been served on counsel for Opposer, Jie (Lisa) Li at the following email addresses: jl@gtlaw.com and GTIPMAIL@gtlaw.com.

September 28, 2021


William H. Oldach III