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

Proceeding	91271929
Party	Defendant REAI, Inc.
Correspondence Address	REAI INC 1954 AIRPORT RD ATLANTA, GA 30341 UNITED STATES Primary Email: james@reai.co 404-518-5943
Submission	Answer
Filer's Name	James Wang
Filer's email	james@reai.co
Signature	/jameswang/
Date	12/01/2021
Attachments	Answer to Opposition 91271929.pdf(74176 bytes )

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

RE/MAX, LLC	)	
	)	
Opposer,	)	Opposition No. 91271929
	)	
v.	)	Serial No. 90/450,818
	)	
REAI, Inc.	)	Mark: REMATCH
Applicant.	)	
	)	
	)	

**ANSWER TO NOTICE OF OPPOSITION**

Applicant REAI, Inc. (“Applicant”) hereby answers the notice of opposition of Opposer RE/Max LLC (“Opposer”) as following. All allegations not specifically admitted herein are denied.

1. Applicant denies the allegation in the first, unnumbered paragraph.
2. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 1, and therefore, denies the same.
3. Applicant denies allegations in Paragraph 2.
4. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 3, and therefore, denies the same.
5. Applicant denies allegations in Paragraph 4.

6. Applicant denies allegations in Paragraph 5.
7. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 6, and therefore, denies the same.
8. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 7, and therefore, denies the same.
9. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 8, and therefore, denies the same.
10. Applicant denies allegations in Paragraph 9.
11. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 10, and therefore, denies the same.
12. Applicant denies allegations in Paragraph 11.
13. Applicant admits allegations in Paragraph 12.
14. Applicant denies allegations in Paragraph 13.
15. Applicant admits allegations in Paragraph 14 although notes that prior to Opposer filing opposition, Applicant had communicated with Opposer regarding the fundamental difference between the two marks.
16. Applicant denies allegations in Paragraph 15.
17. Applicant denies allegations in Paragraph 16.
18. Applicant denies allegations in Paragraph 17.
19. Applicant denies allegations in Paragraph 18.
20. Applicant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 19, and therefore, denies the same.
21. Applicant denies allegations in Paragraph 20.

**AFFIRMATIVE DEFENSES**

22. No likelihood of confusion exists between Applicant's use of its REMATCH mark and Opposer's use of its RE/Max Marks.

23. Functionality of Applicant's services is different from that of Opposer's.

24. Third parties have used similar marks of Opposer with similar services, while Applicant's mark more distant with service different.

Respectfully submitted,

Dated: December 1, 2021

**REAI, Inc.**

By: /James Wang/

James Wang

Tel: (404) 518-5943

Email: James@reai.co

**REPRESENTATIVE OF APPLICANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on Dec 1, 2021 a true and correct copy of the foregoing was served via email upon Opposer's general counsel at the following via email:

Ashley Krause

RE/Max LLC.

[akrause@remax.com](mailto:akrause@remax.com)

Dated: December 1, 2021

/James Wang/