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

Proceeding no.	91282533
Party	Defendant HSU, FUCHANG
Correspondence address	OTTO O. LEE INTELLECTUAL PROPERTY LAW GROUP LLP 1871 THE ALAMEDA, SUITE 250 SAN JOSE, CA 95126 UNITED STATES Primary email: tm_docket@iplg.com 408-286-8933
Submission	Answer
Filer's name	Kevin Viau
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Date	02/06/2023
Attachments	2023.02.06_Answer to Opposition_91282533.pdf(115465 bytes)

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

MICRON TECHNOLOGY, INC.,

Opposer,

v.

FU-CHANG HSU,

Applicant.

Mark: X-DRAM

Opposition No.: 91282533

Serial No.: 97222188

**APPLICANT'S ANSWER TO NOTICE OF
OPPOSITION**

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER

Applicant Fu-Chang Hsu ("Hsu") hereby answers the Notice of Opposition filed by Opposer Micron Technology, Inc. ("Micron") as follows.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1, and accordingly denies the allegations contained therein.
2. Applicant admits the allegations of Paragraph 2.
3. Applicant admits the allegations of Paragraph 3.
4. Applicant admits the allegations of Paragraph 4.
5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5, and accordingly denies the allegations contained therein.
6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6, and accordingly denies the allegations contained therein.

7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7, and accordingly denies the allegations contained therein.

8. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8, and accordingly denies the allegations contained therein.

9. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9, and accordingly denies the allegations contained therein.

10. Applicant admits that in its Office Action Response dated April 24, 2020 for App. Serial No. 88540624, it stated “XNAND or X-NAND suggests ‘Express-NAND.’” Applicant denies that its X-DRAM mark describes the products offered under the mark. Applicant lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations of Paragraph 10, and accordingly denies the allegations contained therein.

11. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 11, and accordingly denies the allegations contained therein.

12. Applicant denies the allegations of Paragraph 12.

WHEREFORE, Applicant prays that the Notice of Opposition be denied and dismissed with prejudice, that Application Serial No. 97222188 be permitted to proceed toward registration on the Principal Register, and for such other and further relief as the Board deems just and proper.

Dated: February 6, 2023

By: /Kevin Viau/
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to this action. I am employed in the County of Santa Clara, California, and my business address is 1871 The Alameda, Suite 250, San Jose, California 95126.

I hereby certify that on February 6, 2023, I served the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION** on Opposer via email by sending the document to the person(s) at the email addresses listed below.

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Attorneys for Opposer

Dated: February 6, 2023

By: /Kevin Viau/
Kevin Viau