

ESTTA Tracking number: **ESTTA1320242**Filing date: **11/06/2023**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91287364
Party	Defendant Epoq Group Ltd
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Date	11/06/2023
Attachments	LAWASSURE- Answer to Second Notice of Opposition.pdf(103887 bytes)

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

In the matter of Trademark App. Ser. No. 97077449
For the Mark: LAWASSURE

Technology & Entrepreneurial Ventures Law)	
Group PC)	
)	
Opposer,)	
)	
v.)	Opposition No.: 91287364
)	
Epoq Group Ltd.,)	
)	
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

Epoq Group Ltd. (“Applicant”), for its Answer to the Notice of Opposition filed by Technology & Entrepreneurial Ventures Law (“Opposer”) against the trademark application for the LAWASSURE mark, Serial No. 97077449 (the “Application”), responds as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations contained in Paragraph 1, and therefore denies the same.
2. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.
3. Applicant denies the allegations contained in Paragraph 3.
4. Applicant is without knowledge or information sufficient to form a belief as whether Opposer is the “exclusive owner of the Registered Mark,” and therefore denies the same. Applicant admits that Opposer appears to be the owner of Reg. No. 4,364,377 and that such registration has reached “incontestable” status.
5. Applicant denies the allegations contained in Paragraph 5.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations contained in Paragraph 6, and therefore denies the same.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations contained in Paragraph 7, and therefore denies the same.

8. Applicant denies the allegations contained in Paragraph 8.

9. Applicant denies the allegations contained in Paragraph 9.

10. Applicant denies the allegations contained in Paragraph 10.

11. Applicant denies the allegations contained in Paragraph 11.

12. Applicant denies the allegations contained in Paragraph 12.

13. Applicant admits the allegations contained in Paragraph 13.

14. Applicant denies the allegations contained in Paragraph 14, including subparts (a) and (b).

15. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

16. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

COUNT I

17. Applicant repeats each and every response set forth in Paragraphs 1 through 16 of this Answer in response to Paragraph 17 of the Notice of Opposition.

18. Applicant denies the allegations contained in Paragraph 18.

19. Applicant denies the allegations contained in Paragraph 19.

COUNT II

20. Applicant repeats each and every response set forth in Paragraphs 1 through 19 of this Answer in response to Paragraph 20 of the Notice of Opposition.

21. Applicant admits the allegation in Paragraph 21(c), but denies all other allegations contained in Paragraph 21, including subparts (a), (b), and (d).

22. Applicant denies the allegations contained in Paragraph 22.

23. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

COUNT III

24. Applicant repeats each and every response set forth in Paragraphs 1 through 23 of this Answer in response to Paragraph 24 of the Notice of Opposition.

25. Applicant denies the allegations contained in Paragraph 25.

26. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

COUNT IV

27. Applicant repeats each and every response set forth in Paragraphs 1 through 26 of this Answer in response to Paragraph 27 of the Notice of Opposition.

28. Applicant denies the allegations contained in Paragraph 28.

29. Applicant denies the allegations contained in Paragraph 29.

30. Applicant denies the allegations contained in Paragraph 30.

31. Applicant denies the allegations contained in Paragraph 31.

32. Applicant denies the allegations contained in Paragraph 32.

33. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

COUNT V

34. Applicant repeats each and every response set forth in Paragraphs 1 through 33 of this Answer in response to Paragraph 34 of the Notice of Opposition.

35. Applicant denies the allegations contained in Paragraph 35.

36. Applicant denies the allegations contained in Paragraph 36.

37. Applicant denies the allegations contained in Paragraph 37.

38. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

COUNT VI

39. Applicant repeats each and every response set forth in Paragraphs 1 through 38 of this Answer in response to Paragraph 39 of the Notice of Opposition.

40. Applicant denies the allegations contained in Paragraph 40.

41. Applicant denies the allegations contained in Paragraph 41.

42. Applicant denies the allegations contained in Paragraph 42.

43. Applicant is without knowledge or information sufficient to form a belief as to what Opposer “believes,” and therefore denies the same. Applicant further denies that Opposer’s purported belief has any validity.

WHEREFORE, Applicant respectfully requests that the Notice of Opposition be dismissed with prejudice and on the merits, and that the Application be allowed.

Respectfully submitted,

Dated: November 6, 2023

By: s/Bradley M. Stohry/
Bradley M. Stohry
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Attorney for Epoq Group Ltd.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer to Notice of Opposition has been served on counsel for Opposer, Gregg Zegarelli, by emailing said copy on November 6, 2023 to mailroom.grz@zegarelli.com.

By: s/Bradley M. Stohry/
Bradley M. Stohry