

ESTTA Tracking number: **ESTTA1366225**  
Filing date: **06/20/2024**

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

Proceeding no.	91291406
Party	Defendant Shanghai Zhenglang Technology Co., Ltd.
Correspondence address	MARC A. LIEBERSTEIN KILPATRICK TOWNSEND & STOCKTON LLP 1114 AVENUE OF THE AMERICAS 21ST FLOOR NEW YORK, NY 10036 UNITED STATES Primary email: tmadmin@kilpatricktownsend.com Secondary email(s): kts-zhenglang@kilpatricktownsend.com 212-775-8700
Submission	Answer
Filer's name	Rose Kautz
Filer's email	rkautz@ktslaw.com
Signature	/Rose Kautz/
Date	06/20/2024
Attachments	2024.06.20 Answer_91291406.pdf(291958 bytes )

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

HANGZHOU MENGKU TECHNOLOGY,  
CO., LTD.,

Opposer,

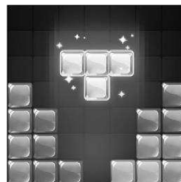
v.

SHANGHAI ZHENGLANG  
TECHNOLOGY CO., LTD.,

Applicant.

**Opposition No. 91291406**

Mark: U.S. Ser. No. 97699003



**ANSWER TO NOTICE OF OPPOSITION**

Applicant SHANGHAI ZHENGLANG TECHNOLOGY CO., LTD. (hereafter, “Applicant”) submits this answer to the Notice of Opposition filed by HANGZHOU MENGKU TECHNOLOGY CO., LTD (hereafter, “Opposer”). To the extent not explicitly admitted, all allegations in the Notice of Opposition, including any assumptions or predicates included in Opposer’s allegations, are denied.

Applicant responds as follows:

In response to the unnumbered preamble of the Notice of Opposition, Applicant admits that Opposer is opposing registration of Applicant’s design mark depicted in U.S. Application Serial No. 97699003 (“Applicant’s Mark” and the “Application”) and admits that Applicant’s Mark was filed on December 1, 2022 and that it was published in the Official Gazette on March 12, 2024. Applicant denies knowledge or information sufficient to form a belief as to whether Opposer believes it will be damaged by registration of Applicant’s Mark, and denies that Opposer will be damaged by registration of Applicant’s Mark.

1. Admitted.
2. Admitted.

3. The allegations in Paragraph 3 contain legal conclusions that do not require a response. To the extent an answer is deemed necessary, Applicant denies all allegations in Paragraph 3.

4. The allegations in Paragraph 4 contain legal conclusions that do not require a response. To the extent an answer is deemed necessary, Applicant admits that the specimen submitted with the Application shows use of Applicant's Mark in connection with Applicant's mobile game titled "Block Puzzle Legend." Applicant denies knowledge or information sufficient to form a belief as to the authenticity or accuracy of the document annexed as Exhibit I to the Notice of Opposition. Applicant denies all remaining allegations in Paragraph 4.

5. The allegations in Paragraph 5 contain legal conclusions that do not require a response. To the extent an answer is deemed necessary, Applicant denies all allegations in Paragraph 5. Applicant denies knowledge or information sufficient to form a belief as to the authenticity or accuracy of the document annexed as Exhibit I to the Notice of Opposition.

6. Denied.

7. Applicant denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 7 and Footnote 1 thereto.

8. Applicant admits that Opposer is a competitor of Applicant with respect to mobile games. The allegations in the second sentence of Paragraph 8 contain legal conclusions that do not require a response. To the extent an answer is deemed necessary, Applicant denies the remainder of the allegations in Paragraph 8.

WHEREFORE, Applicant respectfully requests that the Notice of Opposition be in all respects denied.

Dated: June 20, 2024

Respectfully submitted,

/Rose Kautz/

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*Rose Kautz*

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*Attorneys for Applicant*

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HANGZHOU MENGKU TECHNOLOGY,  
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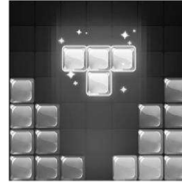
v.

SHANGHAI ZHENGLANG  
TECHNOLOGY CO., LTD.,

Applicant.

**Opposition No. 91291406**

Mark: U.S. Ser. No. 97699003



**CERTIFICATE OF AND SERVICE**

I certify that on June 20, 2024, I served a true and correct copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** to Opposer's counsel by electronic mail at:

Jigang Jin  
Jin Law Firm  
jigang.jin@jfuslaw.com

/Kris Teilhaber/  
Kris Teilhaber  
Kilpatrick Townsend & Stockton LLP