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

Proceeding no.	91299240
Party	Defendant MITS Capital LLC
Correspondence address	MICHAEL G SHARIFF INVENTA CAPITAL PLC 40900 WOODWARD AVENUE SUITE 111 BLOOMFIELD HILLS, MI 48304 UNITED STATES Primary email: inventacapital@gmail.com Secondary email(s): mgs@inventacapital.com, dl@inventacapital.com 248-346-0546
Submission	Answer
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Date	07/06/2025
Attachments	MITS Answer to Oppotision 91299240.pdf(127197 bytes)

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

In the Matter of Application Serial No. 98427569

Published in the Official Gazette of November 26, 2024

MASSACHUSETTS INSTITUTE OF)	
TECHNOLOGY,)	
Opposer,)	
v.)	Opposition No. 91299240
)	
MITS CAPITAL LLC,)	
Applicant.)	

ANSWER TO NOTICE OF OPPOTISION

Mits Capital LLC, a Delaware LLC, by their undersigned counsel, hereby answers the Notice of Opposition.

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 1 of the Notice of Opposition and, therefore, Applicant denies the same.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 2 of the Notice of Opposition and, therefore, Applicant denies the same.

3. Applicant admits that Exhibit A contains records and related documents from the U.S. Patent and Trademark Office but otherwise has no information about the allegations in paragraph 3 of the Notice of Opposition and can neither admit nor deny said allegations.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 4 of the Notice of Opposition and, therefore, Applicant denies the same.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 5 of the Notice of Opposition and, therefore, Applicant denies the same.

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

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

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 8 of the Notice of Opposition and, therefore, Applicant denies the same.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 9 of the Notice of Opposition and, therefore, Applicant denies the same.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 10 of the Notice of Opposition and, therefore, Applicant denies the same.

11. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 11 of the Notice of Opposition and, therefore, Applicant denies the same.

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 12 of the Notice of Opposition and, therefore, Applicant denies the same.

13. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 13 of the Notice of Opposition and, therefore, Applicant denies the same.

14. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 14 of the Notice of Opposition and, therefore, Applicant denies the same.

15. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 15 of the Notice of Opposition and, therefore, Applicant denies the same.

16. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 16 of the Notice of Opposition and, therefore, Applicant denies the same.

17. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 17 of the Notice of Opposition and, therefore, Applicant denies the same.

18. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 18 of the Notice of Opposition and, therefore, Applicant denies the same.

19. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 19 of the Notice of Opposition and, therefore, Applicant denies the same.

20. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 20 of the Notice of Opposition and, therefore, Applicant denies the same.

21. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 21 of the Notice of Opposition and, therefore, Applicant denies the same.

22. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 22 of the Notice of Opposition and, therefore, Applicant denies the same.

23. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 23 of the Notice of Opposition and, therefore, Applicant denies the same.

24. Applicant admits the allegations in paragraph 24 of the Notice of Opposition.

25. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 25 of the Notice of Opposition and, therefore, Applicant denies the same.

26. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 26 of the Notice of Opposition and, therefore, Applicant denies the same.

27 Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 27 of the Notice of Opposition and, therefore, Applicant denies the same.

28. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 28 of the Notice of Opposition and, therefore, Applicant denies the same.

29. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 29 of the Notice of Opposition and, therefore, Applicant denies the same.

30. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 30 of the Notice of Opposition and, therefore, Applicant denies the same.

31. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 31 of the Notice of Opposition and, therefore, Applicant denies the same.

32. Applicant admits the allegations in paragraph 32 of the Notice of Opposition.

33. Applicant denies the allegations in paragraph 33 of the Notice of Opposition.

34. Applicant admits the MITS Mark features the word element, MITS, in freestanding, capital letter formation. Applicant denies the remaining allegations in paragraph 34 of the Notice of Opposition.

35. Applicant admits MITS is the only word portion of Applicant's MITS Mark, but denies any implication that this fact alone establishes a likelihood of confusion or supports Opposer's claims.

36. Applicant admits the "Description of the Mark" states: "The mark consists of the wording 'MITS' in a stylized font to the right of two stylized propellers." Applicant denies the remaining allegations in paragraph 36 of the Notice of Opposition.

37. Applicant denies the allegations in paragraph 37 of the Notice of Opposition.

38. Applicant denies the allegations in paragraph 38 of the Notice of Opposition.

39. Applicant states that paragraph 39 of the Notice of Opposition merely incorporates by reference prior allegations, to which Applicant has already responded. Therefore, no further response is required. To the extent a response is deemed necessary, Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraphs 1-2, 4-23, 25-31 of the Notice of Opposition and, therefore, Applicant denies the

same. Applicant denies the allegations in paragraphs 33, 37, 38 of the Notice of Opposition.
Applicant partially denies the allegations in paragraphs 34-36.

40. Applicant denies the allegations in paragraph 40 of the Notice of Opposition.

41. Applicant denies the allegations in paragraph 41 of the Notice of Opposition.

42. Applicant denies the allegations in paragraph 42 of the Notice of Opposition.

43. Applicant denies the allegations in paragraph 43 of the Notice of Opposition.

44. Applicant denies the allegations in paragraph 44 of the Notice of Opposition.

45. Applicant denies the allegations in paragraph 45 of the Notice of Opposition.

46. Applicant states that paragraph 46 of the Notice of Opposition merely incorporates by reference prior allegations, to which Applicant has already responded. Therefore, no further response is required. To the extent a response is deemed necessary, Applicant denies the allegations in paragraphs 40-45 of the Notice of Opposition.

47. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 47 of the Notice of Opposition and, therefore, Applicant denies the same.

48. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 48 of the Notice of Opposition and, therefore, Applicant denies the same.

49. Applicant denies the allegations in paragraph 49 of the Notice of Opposition.

50. Applicant denies the allegations in paragraph 50 of the Notice of Opposition.

51. Applicant denies the allegations in paragraph 51 of the Notice of Opposition.

WHEREFORE, Applicant, by its undersigned counsel, prays that this Opposition be dismissed with prejudice and the Applicant be granted registration.

Applicant has appointed Mariya Ortynska, who is a member of the Bar of the State of New York (Bar member number 6145866, admitted in 2024) and whose address is Ortynska Law PLLC, 250 Park Avenue, office 7106, New York, NY, 10177, as its duly authorized agent and attorney in the matter of this Answer to Opposition and this Opposition proceeding, with full power of substitution and revocation, to transact all business with the U.S. Patent and Trademark Office and elsewhere in connection with this Opposition Proceeding, to sign all papers which may be hereinafter filed in connection with this Opposition Proceeding, and to receive all communications relating to this Opposition Proceeding.

The Board may communicate with Applicant's attorney by the e-mail address noted below.

Respectfully submitted,

Dated: July 4, 2025

By: MariyaOrtynska/

Mariya Ortynska
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Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on July 4, 2025, I served this Answer to the Notice of Opposition on the Opposer by emailing, addressed to Opposer's correspondence address of record as follows:

michelle.gallagher@wilsonelser.com, shan.alvarez@wilsonelser.com, trade-mark@wilsonelser.com, patricia.carroll@wilsonelser.com

/MariyaOrtynska/

Mariya Ortynska