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

Proceeding	92061859
Party	Defendant Investment Financial Services, Inc.
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Submission	Answer
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Signature	/Maurice N. Ross/
Date	11/23/2015
Attachments	92061859 - IFS Answer to Petition to Cancel (with Certificate of Service).pdf(26863 bytes)

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

In re Registration No. 3,782,665
Mark: FINANCIAL QUARTERBACK
Registered: April 27, 2010

ADELMAN, KATZ & MOND LLP, Petitioner, -against- INVESTMENT FINANCIAL SERVICES, INC., Respondent.
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Cancellation No. 92061859

RESPONDENT’S ANSWER TO PETITION TO CANCEL

Respondent Investment Financial Services, Inc. (“Respondent”), by and through its counsel, Barton LLP, hereby responds to Adelman, Katz & Mond LLP’s (“Petitioner”) Petition to Cancel (the “Petition”) as follows:

1. Denies knowledge and information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of the Petition.
2. Denies knowledge and information sufficient to form a belief as to the truth of the allegations set forth in paragraph 2 of the Petition.
3. Admits that Jalinski Advisory Group’s (JAG) counsel issued a letter to Petitioner dated May 7, 2015, but denies Petitioner’s characterization of the letter and refers the Board to the letter for a complete and accurate statement of its contents.
4. Admits that Respondent at one time licensed the “Financial Quarterback” trademark rights to JAG, but avers that the “Financial Quarterback” trademark rights have since been assigned to JAG and that JAG is now the owner of said rights, and denies Petitioner’s

characterization of the letter and refers the Board to the letter for a complete and accurate statement of its contents.

5. Admits the allegations set forth in paragraph 5 of the Petition.

6. Denies the allegations set forth in paragraph 6 of the Petition.

7. Denies the allegations set forth in paragraph 7 of the Petition.

8. Denies the allegations set forth in paragraph 8 of the Petition.

9. Denies the allegations set forth in paragraph 9 of the Petition.

10. Denies the allegations set forth in paragraph 10 of the Petition.

11. Denies the allegations set forth in paragraph 11 of the Petition.

12. Denies the allegations set forth in paragraph 12 of the Petition.

13. Denies the allegations set forth in paragraph 13 of the Petition.

14. Denies the allegations set forth in paragraph 14 of the Petition.

15. Denies the allegations set forth in paragraph 15 of the Petition, but admits that the quoted excerpt from Respondent's Combined Declaration of Use and Incontestability Under Sections 8 & 15 to the Commissioner for Trademarks is accurate.

16. Admits that on April 28, 2015, Anliker filed a petition to cancel the Registration, but denies Petitioner's characterization of the petition and refers the Board to the petition for a complete and accurate statement of its contents.

17. Denies the allegations set forth in paragraph 17 of the Petition.

18. Admits that on April 28, 2015, Anliker filed a petition to cancel the Registration, but denies that the petition remains presently pending.

19. Denies the allegations set forth in paragraph 19 of the Petition.

20. Denies the allegations set forth in paragraph 20 of the Petition.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of RESPONDENT'S ANSWER TO PETITION TO CANCEL was served upon Petitioner by First Class Mail at the following address on November 23, 2015:

Joshua R. Bressler
Bressler Law PLLC
3 W 35th St, 9th Fl.
New York, NY 10001

/William Kang/
William Kang