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

Proceeding	91267844
Party	Defendant TitlePal, Inc.
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Date	08/27/2021
Attachments	TitlePal Answer to First Amended Notice of Opposition.pdf(506054 bytes)

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

In the matter of
Trademark Application Serial No.: 88/939,727
Filed: May 29, 2020
Published: October 27, 2020
Mark: TITLEPAL

PayPal, Inc.)	
)	
Opposer,)	Opposition No. 91267844
)	
vs.)	
)	
TitlePal, Inc.)	
)	
Applicant.)	

ANSWER TO FIRST AMENDED NOTICE OF OPPOSITION

Applicant TitlePal, Inc. (“TitlePal”), by and through its undersigned counsel, responds to Opposer PayPal, Inc.’s First Amended Notice of Opposition as set forth below. Except as otherwise expressly admitted, TitlePal denies each and every allegation contained in the Notice of Opposition.

1. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 1 and therefore denies these allegations.
2. TitlePal admits that the online TSDR records of the U.S. Patent and Trademark Office (“USPTO”), which are printed and attached to the First Amended Notice of Opposition, are consistent with the allegations set forth in Paragraph 2.
3. TitlePal admits that the online TSDR records of the USPTO, which are printed and attached to the First Amended Notice of Opposition, are consistent with the allegations set forth in

Paragraph 3. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of Paragraph 3 and therefore denies these allegations.

4. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 4 and therefore denies these allegations.
5. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 5 and therefore denies these allegations.
6. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 6 and therefore denies these allegations.
7. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 7 and therefore denies these allegations.
8. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 8 and therefore denies these allegations.
9. TitlePal admits the allegations of Paragraph 9.
10. TitlePal admits that Opposer commenced use of the mark PAYPAL prior to TitlePal's application date. TitlePal denies that the foregoing admission resolves the issue of priority with respect to the Marks at issue and their respective services, and further denies the remaining allegations of Paragraph 10.
11. TitlePal denies the allegations of Paragraph 11.
12. TitlePal lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 12 and therefore denies these allegations.
13. TitlePal admits the allegations set forth in Paragraph 13 only to the extent that the online TSDR records of the USPTO, which are printed and attached to the Notice of Opposition, show that the goods and services covered by the TitlePal application and the goods and

services covered by PayPal's cited applications and registrations are accurately described by the allegations of Paragraph 13. TitlePal denies the remaining allegations of Paragraph 13.

14. TitlePal admits the allegations set forth in Paragraph 14 only to the extent that the online TSDR records of the USPTO, which are printed and attached to the Notice of Opposition, show that the goods and services covered by the TitlePal application and the goods and services covered by PayPal's cited applications and registrations are accurately described by the allegations of Paragraph 14. TitlePal denies the remaining allegations of Paragraph 13.

15. TitlePal denies the allegations of Paragraph 15.

16. TitlePal admits the allegations of Paragraph 16.

17. TitlePal admits the allegations of Paragraph 17.

18. TitlePal admits that the TITLEPAL mark contains the prefix "TITLE." TitlePal denies the remaining allegations of Paragraph 18.

19. TitlePal denies the allegations of Paragraph 19.

20. TitlePal denies the allegations of Paragraph 20.

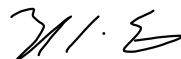
21. TitlePal denies the allegations of Paragraph 21.

22. TitlePal denies the allegations of Paragraph 22.

23. TitlePal denies the allegations of Paragraph 23.

Date: August 27, 2021

Respectfully submitted,
BEKIARES ELIEZER, LLP

By:  _____

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