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

Proceeding	91184820
Party	Defendant CROWN MELBOURNE LIMITED
Correspondence Address	LUCAS J. TUCKER LIONEL SAWYER & COLLINS, LTD. 300 S 4TH ST STE 1700 LAS VEGAS, NV 89101-6053 ipgroup@lionelsawyer.com
Submission	Answer
Filer's Name	Lucas J. Tucker
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Signature	/Lucas J. Tucker/
Date	08/04/2008
Attachments	Answer to Opp 91184820.pdf (3 pages)(21252 bytes)

1 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
3

4 SIX CONTINENTS HOTELS, INC.,

5 Opposer

Opposition No. 91184820

6 v.

7 CROWN MELBOURNE LIMITED,

ANSWER

8 Applicant

9
10 Applicant, Crown Melbourne Limited, a corporation organized under the laws of
11 Australia (“Applicant”) hereby answers the allegations made by Opposer Six Continents Hotels,
12 Inc. (“Opposer”) in its Opposition dated June 25, 2008.

13 1. Applicant denies all of Opposer’s averments in Paragraph 1 of the Notice of
14 Opposition.

15 2. Applicant denies all of Opposer’s averments in Paragraph 2 of the Notice of
16 Opposition.

17 3. Applicant is without sufficient information to form a belief as to the averments in
18 Paragraph 3 of the Notice of Opposition concerning the extent of Opposer’s business operations
19 and which of those operations use the service mark CROWNE PLAZA.

20 4. Applicant admits that Opposer is the owner of record of Registration Nos.
21 1297211 and 2895328 (“Opposer’s Marks”), and that such registrations have not been cancelled,
22 but Applicant is without sufficient information to form a belief as to the averments in Paragraph
23 4 of the Notice of Opposition concerning whether such registrations are validly subsisting.

24 5. Applicant admits all of Opposer’s averments in Paragraph 5 of the Notice of
25 Opposition.

26 6. Applicant denies all of Opposer’s averments in Paragraph 6 of the Notice of
27 Opposition.

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1 7. Applicant denies all of Opposer's averments in Paragraph 7 of the Notice of
2 Opposition.

3 WHEREFORE, Opposer's grounds for opposition are not supported by fact, and there is
4 no likelihood that the registration of Applicant's Mark would create confusion with Opposer's
5 Marks. Applicant prays that Opposer be denied its requested relief and that Applicant's Mark be
6 allowed to proceed toward registration.

7 Dated this 4th day of August, 2008

8 LIONEL SAWYER & COLLINS

9 By: /s/ Lucas J. Tucker
10 Lucas J. Tucker
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12 300 South Fourth Street
13 Las Vegas, Nevada 89101
14 (702) 383-8888

15 Attorney for Applicant
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Certificate of Service

A copy of the foregoing Answer was served by first class mail, postage prepaid, upon Albert L. Robin, attorney for Opposer, at Cowan, Liebowitz & Latman, P.C., 1133 Avenue of the Americas, New York, New York 10036-6799, this 4th day of August, 2008.

/s/ Lucas J. Tucker
Lucas J. Tucker