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August 9, 2008

United States Patent and Trademark Office
Trademark Trial and Appeal Board
Post Office Box 1451
Alexandria, Virginia 22313-1451

77/106,927

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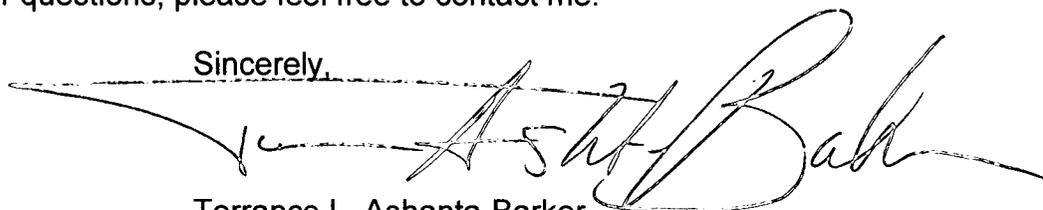
Re: Answer to the Notice of Opposition
Bridges to Community, Inc v. BRIDGES for a Just Community, Inc.
Opposition number: 91185031

Dear Sir or Madam:

Attached is our client's answer to the Notice of Opposition filed by Bridges to Community, Inc. on July 3, 2008 (the "Answer"). Please record the date of delivery and forward the Answer to the Trademark Trial and Appeal Board.

If there are any other questions, please feel free to contact me.

Sincerely,



Terrance L. Ashanta-Barker

TLA:pk
Enclosures

cc: Robert C. Harrod
Daniel J. Hoffheimer
Margaret A. Lawson

{W1349372.1}



08-12-2008

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

BRIDGES TO COMMUNITY, INC.,

Opposer,

Opposition No. 91185031

v.

BRIDGES FOR A JUST COMMUNITY,
INC.,

Applicant

Assistant Commissioner for Trademarks
Post Office Box 1451
Alexandria, Virginia 22313

APPLICANT'S ANSWER TO THE NOTICE OF OPPOSITION

In response to the Notice of Opposition (the "**Notice**") filed by Bridges to Community, Inc., a New York non-profit corporation whose principal place of business is at 95 Croton Avenue, Ossining, New York 10562 (the "**Opposer**"), the applicant, Bridges for a Just Community, an Ohio non-profit corporation whose principal place of business is at 430 Reading Road, Cincinnati, Ohio 45202 (the "**Applicant**") answers the Notice of Opposition identified above as follows:

1. In response to the allegations of Paragraph 1 of the Notice, the Applicant admits that Trademark Application Serial No. 77/049,518 in International Class 35 for the mark "Bridges for a Just Community" and Trademark Application Serial No. 77/106, 927 in International Class 35 for the mark "Bridges for a Just Community and Design". However, the Applicant denies that the Opposer's challenges to both applications are based on common

questions of law and fact and the Opposer's allegation relating to
appropriateness of consolidation.

2. In response to the allegations of Paragraph 2 of the Notice, the Applicant denies all allegations.

3. The Applicant admits to the allegations in Paragraph 3 of the Notice.

4. In response to the allegations of Paragraph 4 of the Notice, the Applicant admits to having a place of business at 106 East Eighth Street, Cincinnati, Ohio 45202 and a place of business at 430 Reading Road, Cincinnati, Ohio 45202. However, Applicant denies the remainder of the allegations within Paragraph 4 of the Notice.

5. The Applicant confirms that the Notice does not have a Paragraph 5; therefore no answer has been provided.

6. The Applicant denies the allegations in Paragraphs, 6, 7, 8, 9, 10, 11 and 12 of the Notice.

AFFIRMATIVE DEFENSES

In further answer to the Notice, the Applicant asserts that:

7. The Opposer has failed to allege grounds sufficient to establish its standing to maintain the present Opposition.

8. The Applicant further affirmatively alleges that the Opposer has failed to allege grounds sufficient to establish an opposition claim of likelihood of confusion.

9. The Applicant further affirmatively alleges that as a result of its continuous substantial and nationwide usage of its marks "Bridges for a Just Community" since its adoption, these marks are viable assets of the Applicant and carry considerable goodwill and consumer acceptance of its services which are provided under these marks. Such goodwill and widespread usage has made the marks distinctive to the Applicant.

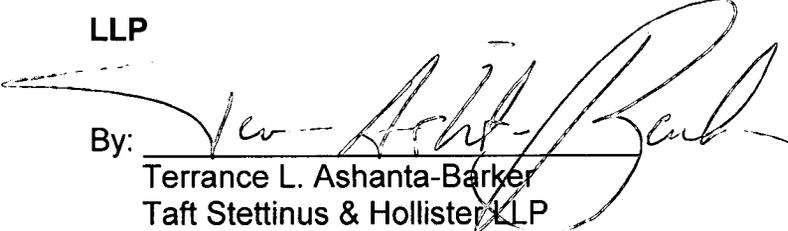
10. The Applicant further affirmatively alleges that since the Opposer's alleged mark "Bridges to Community" uses the words "Bridges" and "Community", which are both common in the non-profit, social awareness and community building arena, the use of "Bridges" and "Community" cannot be distinctive to the Opposer. Since no other portions of the "Bridges for a Just Community" marks are in any way similar to the "Bridges to Community" mark of the Opposer, there can be no likelihood of confusion. In addition, many third-party registrations and uses now exist and have existed of "Bridges" and/or "Community" containing marks in the social awareness and community building field.

11. The Applicant further affirmatively alleges that there is no likelihood of confusion, mistake or deception because inter alia, the Applicant's marks and the pleaded marks of the Opposer are not confusingly similar. The Opposer's

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER

LLP

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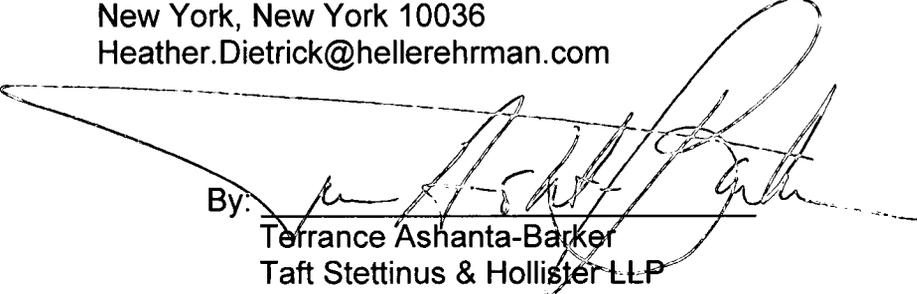
Dated: August 9, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing APPLICANT'S ANSWER was mailed by electronic mail on August 9, 2008 and by first class mail, on August 11, 2008, to the Opposer's counsel at the following address:

Heather Dietrick
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Times Square Tower
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New York, New York 10036
Heather.Dietrick@hellerehrman.com

Dated: August 9, 2008

By: 

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Attorneys for the Applicant

Please refer to our File Document No: 1314384