

ESTTA Tracking number: **ESTTA321691**

Filing date: **12/14/2009**

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

Proceeding	91192540
Party	Defendant Senture, LLC
Correspondence Address	MICHAEL S. HARGIS KING & SCHICKLI, PLLC 247 N BROADWAY LEXINGTON, KY 40507-1058 michael@iplaw1.net
Submission	Answer
Filer's Name	Michael S. Hargis
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Signature	/Michael S. Hargis/
Date	12/14/2009
Attachments	Answer to Notice of Opposition.pdf (5 pages)(1239500 bytes)

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

In the Matter of Registration Application Serial No. 77/419,835
Filed March 12, 2008
For the mark SENTURE
Published in the *Official Gazette* on July 7, 2009

ACCENTURE GLOBAL SERVICES GMBH	:	
	:	
v.	:	OPPOSITION NO. 91192540
	:	
SENTURE, LLC	:	
	:	
Applicant.	:	

ANSWER TO NOTICE OF OPPOSITION AND AFFIRMATIVE DEFENSES

Senture, LLC (“Applicant”), by counsel, hereby states the following for its Answer to the Notice of Opposition filed by Accenture Global Services, GmbH (“Opposer”):

1. Applicant states that it is without information sufficient to form a belief as to the truth of the allegations of paragraph 1 of the Opposition and therefore denies the same.
2. Applicant admits that U.S. Registration Nos. 3091811, 2665373, 2884125, 3340780, and 2788134 are each listed in the U.S. Patent and Trademark Office as being owned by Opposer. Applicant denies the remaining allegations.
3. Applicant states that it is without information sufficient to form a belief as to the truth of the allegations of paragraph 3 of the Opposition and therefore denies the same.
4. Applicant states that it is without information sufficient to form a belief as to the truth

- of the allegations of paragraph 4 of the Opposition and therefore denies the same.
5. Applicant denies that the ACCENTURE mark is famous. Further, Applicant states that it is without information sufficient to form a belief as to the remaining allegations regarding offices, advertising and income statistics, and therefore denies each of the remaining allegations in paragraph 5.
 6. Applicant admits that its U.S. Registration Application Ser. No. 77/419835 exists on the records of the U.S. Patent and Trademark Office and states that the terms of such records are self-evident.
 7. Applicant denies the allegations set forth in paragraph 7. Applicant admits that it began using its mark SENTURE in association with the services set forth in its U.S. Registration Application Ser. No. 77/419835 at least as early as December 15, 2006.
 8. Applicant states that it is without information sufficient to form a belief as to the truth of the allegations of paragraph 8 of the Opposition and therefore denies the same.
 9. Applicant denies the allegations contained in paragraph 9 of the Opposition.
 10. Applicant denies the allegations contained in paragraph 10 of the Opposition.
 11. Applicant denies the allegations contained in paragraph 11 of the Opposition.
 12. Applicant denies the allegations contained in paragraph 12 of the Opposition.
 13. Applicant denies the allegations contained in paragraph 13 of the Opposition.
 14. Applicant denies any other allegations of the Notice of Opposition not otherwise

expressly admitted.

AFFIRMATIVE DEFENSES

First Defense

The Notice of Opposition fails to state a claim upon which relief may be granted.

Second Defense

Per 15 U.S.C. § 1052(d), the mark at issue in the Application is not a mark “which so resembles a mark registered in the Patent and Trademark Office, or a mark or a trade name previously used in the United States by another and not abandoned, as to be likely, when applied to the goods and services of the Applicant, to cause confusion, or to cause mistake or to deceive.”

Third Defense

To the extent Applicant's U.S. Registration Application Ser. No. 77/419835 could be approved on terms or with restrictions or modifications eliminating any basis for opposition or ground for denial of registration, Applicant is entitled to and seeks such relief.

* * *

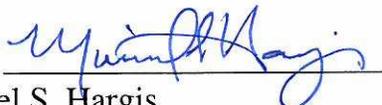
Applicant reserves the right to conduct discovery in this action concerning potential additional affirmative defenses and/or potential counterclaims herein, specifically including defenses and/or claims, related to the basis for opposition, premised upon abandonment,

misuse, acquiescence, laches, estoppel, improper or void assignment, and improper or void licensing.

FOR THE FOREGOING REASONS, Applicant respectfully requests that the Notice of Opposition be dismissed, with prejudice, and that the Board permit registration of Applicant's SENTURE mark on the Principal Register.

SENTURE, LLC

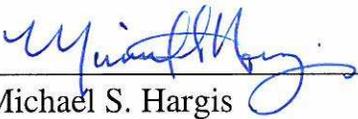
December 14, 2009

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December 2009, a true and correct copy of the foregoing ANSWER TO NOTICE OF OPPOSITION AND AFFIRMATIVE DEFENSES was served on attorney for Opposer via first-class mail, U.S. Mail, postage prepaid, to:

BAKER & McKENZIE LLP
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