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

Proceeding	91194763
Party	Defendant Torrance L. Hampton, Caleb K. Sawyer
Correspondence Address	TORRANCE L. HAMPTON 1318 W BROAD ST STE A RICHMOND, VA 23220-3038 UNITED STATES torrance.hampton@gmail.com
Submission	Answer
Filer's Name	Torrance L. Hampton
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Signature	/Torrance L. Hampton/
Date	08/04/2010
Attachments	Answer_842010.pdf (5 pages)(121828 bytes)

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

In re Application No. 77846197
Filed: October 11, 2009
Published: March 16, 2010 in the Official Gazette

LFP IP, LLC,

Opposer,

vs.

TORRANCE L. HAMPTON and
CALEB K. SAWYER,
PRO SE

Opposition No. 91194763

Applicants.

Commissioner for Trademarks
P.O. Box 1452
Alexandria, Virginia 22313-1451

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Trademark application was filed by Torrance L. Hampton and Caleb K. Sawyer ("Applicants") on October 11, 2009. Applicants mailing address is 1318 W. Broad Ste. A, Richmond, Virginia 23220 at the time of the original filing. Said notice was published on March 16, 2010, in the Official Gazette. A Notice of Opposition was filed on May 5, 2010, by LFP IP, LLC ("LFP"), a Delaware Limited Liability Company, located and doing business at 8484 Wilshire Boulevard, Suite 900, Beverly Hills, California 90211.

Applicants received the notice late due to an issue with receipt of mail at above said location. Subsequently, Applicants, non lawyers, and had a difficult time seeking affordable legal representation to assist in complying with the notice. To that end, Applicants respectfully filed a Motion to Set Aside Judgment and Accept Late Filed Answer on August 4, 2010.

Applicants now come before the Trademark Trial and Appeal Board, in the event that the motions are granted, and respectfully file this answer.

Applicants plead and avers as follows:

1. Answering paragraph 1of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

2. Answering paragraph 2 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

3. Answering paragraph 3of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

4. Answering paragraph 4 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

5. Answering paragraph 5of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

6. Answering paragraph 6 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

7. Answering paragraph 7 of the Notice of Opposition, Applicant admits the allegations thereof.

8. Answering paragraph 8 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

9. Answering paragraph 9 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

10. Answering paragraph 10 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

11. Answering paragraph 11 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

12. Answering paragraph 12 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

13. Answering paragraph 13 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

14. Answering paragraph 14 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

15. Answering paragraph 10 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

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

17. Applicant further affirmatively alleges that there is not a similarity between the pleaded marks of the Opposers and the Applicants. Any similarity, if at all, between Applicant's mark HC HUSTLERSCODE.COM and the pleaded marks of Opposer is in the portion "Hustler" which, upon information and belief, has been used and known as being generic and slang for a person that is a hard worker, a deviant business person, or a "wise to the streets" person. Contrary to the Opposers plead marks.

WHEREFORE, Applicants prays that this Notice of Opposition be dismissed.

Dated: August 4, 2010

Respectfully submitted,

Torrance Hampton, Pro Se
Caleb Sawyer, Pro Se

By: /Torrance Hampton/

 /Calab K. Sawyer/

3314 Second Avenue
Richmond, VA 23222

CERTIFICATE OF FILING AND SERVICE

I, Torrance L. Hampton, hereby certify that on August 4, 2010, I caused a true copy of the forgoing ANSWER TO NOTICE OF OPPOSITION to be filed electronically with the United States Patent and Trademark Office and served upon LFP IP, LLC, though Jonathan W. Brown, Esq., Lipstiz Green Scime Cambria LLC, by United States First Class Mail addressed to 42 Delaware Avenue, Suite 120, Buffalo, NY 14202.

Dated: August 4, 2010

_____/Torrance L. Hampton/