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

Proceeding	91206212
Party	Defendant entrotech, inc.
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Date	10/27/2014
Attachments	Answer to Amended Notice of Opposition FINAL.pdf(121856 bytes)

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

In the matter of application Serial Nos.:

85/499,349 for the mark **CHLORADERM**
85/499,345 for the mark **CHLORABSORB**
85/499,337 for the mark **CHLORABOND**
85/499,332 for the mark **CHLORADRAPE**

Filed on December 19, 2011

Published in the *Official Gazette* on May 29, 2012

CAREFUSION 2200, INC.,

Opposer,

v.

ENTROTECH LIFE SCIENCES, INC.,

Applicant.

Combined Opposition Proceeding
No.: 91-206,212

**APPLICANT'S ANSWER TO OPPOSER'S
AMENDED NOTICE OF OPPOSITION**

Through the undersigned counsel, Applicant Entrotech Life Sciences, Inc. ("Applicant") answers the Amended Notice of Opposition ("Amended Opposition") filed against its application Serial Nos. 85/499,349, 85/499,345, 85/499,337, and 85/499,332 (collectively, the "Applications") by Opposer CareFusion 2200, Inc. ("Opposer"), as set forth below. The Answer paragraphs are numbered to correspond to the numbered paragraphs of the Amended Opposition.

The preamble paragraph of the Amended Opposition on pages 1 and 2, which is not numbered, is an introductory paragraph to which no responsive pleading is required. To the extent that a response is deemed necessary, Applicant denies that Opposer will be damaged by

registration of the marks shown in the Applications and denies that the Applications currently are in the name of entrotech, Inc. Applicant lacks knowledge or information sufficient to form a belief as to the allegations concerning Opposer's state of incorporation and principal place of business and, on that basis, denies them.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of Opposer's Amended Opposition and, on that basis, denies the allegations therein.

2. Applicant admits that Opposer is the listed owner of record for U.S. Trademark Registration Nos. 1,930,248 and 4,052,849 for the CHLORAPREP marks, as well as the listed owner of record for U.S. Trademark Registration Nos. 4,488,745 and 4,495,083 for the CHLORASHIELD marks, and that the descriptions of goods set forth in paragraph 2 of Opposer's Amended Opposition match the goods set forth in the foregoing registrations. Applicant admits that the alleged registration dates match the registration dates set forth in the foregoing registrations, but Applicant lacks knowledge or information sufficient to form a belief as to the accuracy of the recited dates. Applicant admits that Exhibit 1, which Opposer originally annexed to its Notice of Opposition, purport to be copies of Trademark Electronic Search System ("TESS") and Assignments on the Web query for Registration Nos. 1,930,248 and 4,052,849 for the CHLORAPREP marks. Applicant also admits that Exhibit 2, which Opposer annexed to its Amended Opposition, purport to be copies of the TESS and Assignments on the Web query for Registration Nos. 4,488,745 and 4,495,083. Except as specifically admitted, Applicant denies each and every allegation set forth in paragraph 2 in its entirety.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3 of Opposer's Amended Opposition and, on that

basis, denies the allegations therein.

4. Applicant admits that it sells medical and health-care related products. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 4 and, on that basis, denies the allegations therein.

5. Denied.

6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 6 and, on that basis, denies the allegations therein.

7. Applicant denies that there are no restrictions in the goods descriptions of the Applications. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 7 and, on that basis, denies the allegations therein.

8. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8 and, on that basis, denies the allegations therein.

9. Denied.

10. Applicant admits that it filed the Applications on December 19, 2011. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations set forth in paragraph 10 and, on that basis, denies the allegations therein.

11. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11 and, on that basis, denies the allegations therein.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

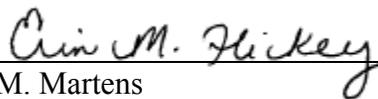
The concluding paragraph of the Amended Opposition on page 6, beginning with the word "WHEREFORE," which is not numbered, is a concluding paragraph to which no responsive pleading is required. To the extent that a response is deemed necessary, Applicant again denies that Opposer will be damaged by registration of the marks shown in the Applications; and

WHEREFORE, this answering Applicant prays for judgment as follows:

1. Dismissal of the Amended Opposition in its entirety and with prejudice;
2. Grant of registrations on Applicant's Proposed Marks; and
3. For such other and further relief as the Board deems just and proper.

Respectfully submitted,

Date: October 27, 2014



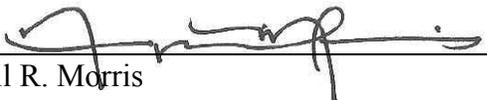
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has this 27th day of October, 2014 been mailed by electronic mail, as agreed to by the parties, to the below-identified attorneys for Opposer:

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