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

Proceeding	91210961
Party	Defendant Roman, Yzzer G
Correspondence Address	Yzzer Roman 1107 S 4TH ST APT 9 CHAMPAIGN, IL 61820 yzzerr@gmail.com
Submission	Answer
Filer's Name	Yzzer G Roman
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Date	07/10/2013
Attachments	Answer - 91210961.pdf(73517 bytes)

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

Enterprise Holdings, Inc., Opposer, v. Yzzer G Roman, Applicant.	Opposition No.: Mark: LEASE MY CAR App. Serial No.: 85/647,875
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APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant, Yzzer G Roman, for his answer to the Notice of Opposition filed by Enterprise Holdings, Inc. against application for registration of his trademark LEASE MY CAR, Application Serial No. 85/647,875 filed June 10, 2012, and published in the Official Gazette of March 5, 2013, pleads and avers as follows:

Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1.

Applicant denies each and every allegation contained in Paragraph 2.

Applicant denies each and every allegation contained in Paragraph 3.

Applicant denies each and every allegation contained in Paragraph 4.

Applicant denies each and every allegation contained in Paragraph 5.

Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 6.

AFFRIMATIVE DEFENSES

Applicant, Yzzer G Roman, a small business owner with principal place of business at 1107 S. 4th Street #9, Champaign IL 61820, pleads and avers as follows:

1. The mark LEASE MY CAR is not descriptive, but is rather suggestive of the services offered.
2. The mark LEASE MY CAR is part of the company’s assets and competitive advantage as a slogan to distinguish it from its competitors. Moreover, the mark suggests the business model employed by the Applicant’s company.

3. Many competitors, including Opposer, use the phrase “RENT-A-CAR” as part of their distinguishing mark. The use of Applicant’s mark will clearly differentiate the Applicant’s company from its competitors.
4. The Opposer’s alleged belief that registration of the Applicant’s mark would damage its operation of more than 6,000 rental offices is not reasonable given the single location of the Applicant’s company.

WHEREFORE, Applicant requests that the notice of opposition be dismissed.

Respectfully submitted,



Yzzer G Roman
1107 S. 4th Street #9
Champaign, IL 61820
(619) 723-5776

Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION has been served by mailing said copy on (insert date of mailing), via First Class Mail, to:

Andrea Anderson
Kazuyo Morita
Holland & Hart LLP
1800 Broadway, Suite 300
Boulder, CO 80302

Attorneys for Opposer
Enterprise Holdings, Inc.


