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

Proceeding	91212292
Party	Defendant LTC Support Services, LLC
Correspondence Address	ALAN R. SINGLETON SINGLETON LAW FIRM, P.C. 2001 S 1ST ST STE 209 CHAMPAIGN, IL 61820-7478  singleton@singletonlawfirm.com
Submission	Answer
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Date	10/15/2013
Attachments	Answer.pdf(22686 bytes )

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

HCR Healthcare, LLC

Opposer,

v.

LTC Support Services, LLC

Applicant

Opposition No. 91212292

**ANSWER TO NOTICE OF OPPOSITION**

Applicant, LTC Support Services, LLC, hereby submits this Answer to the Notice of Opposition filed by Opposer in the above-mentioned proceeding.

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the Notice of Opposition, and based thereon denies those allegations.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Notice of Opposition, and based thereon denies those allegations.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the Notice of Opposition, and based thereon denies those allegations.

4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Notice of Opposition, and based thereon denies those allegations.

5. Applicant admits the allegations in Paragraph 5 of the Notice of Opposition.

6. Applicant denies the allegations in Paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegations in Paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations in Paragraph 8 of the Notice of Opposition.

#### **AFFIRMATIVE DEFENSES**

9. Opposer is not entitled to relief because there is no likelihood of confusion, in that Applicant's and Opposer's marks are not similar in appearance, meaning or overall commercial impression.

10. Opposer is not entitled to relief because there is no likelihood of confusion, in that Applicant's and Opposer's unrelated services are targeted to sophisticated purchasers.

11. Opposer is not entitled to relief because Applicant's mark does not falsely suggest a connection with Opposer's mark.

12. Opposer is not entitled to relief because Opposer's marks are not famous.

13. Opposer is not entitled to relief because Opposer's marks have been weakened due to a crowded field of similar trademarks in use in commerce.

WHEREFORE, Applicant prays that the Trademark Trial and Appeal Board deny the Opposition and permit registration of Applicant's proposed mark in Application Serial Number 85/881,341 and Application Serial Number 85/881,384 in the United States Patent and Trademark Office.

Date: October 15, 2013

Respectfully Submitted,

By:   
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Alan R. Singleton  
Attorney for Applicant / Cross-  
Petitioner

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on this 15th day of October, 2013 by First Class mail and by e-mail upon Opposer's

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By:   
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Alan R. Singleton