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

Proceeding	91220767
Party	Defendant Charles River Laboratories, Inc.
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Date	04/03/2015
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

PRO CORPORATION  
Opposer,

v.

CHARLES RIVER, INC.,  
Applicant.

OPPOSITION NO. 91220767

Mark: RIGHTSOURCE  
Serial No.: 86184957

**APPLICANT’S ANSWER AND AFFIRMATIVE DEFENSES**

Applicant Charles River Laboratories, Inc. (“Applicant”), owner of the above-captioned trademark application, answers the Notice of Opposition filed by Pro Corporation (“Opposer”) as follows:

1. U.S. Trademark Registration No. 2538733 speaks for itself. The remaining allegations are denied.
2. Applicant lacks sufficient information on which to form a belief as to the truth of the allegations in this paragraph and on that basis denies each and every one of them.
3. Denied.
4. Admitted.
5. Denied.
6. Denied.

7. Denied.
8. Denied.

### **AFFIRMATIVE DEFENSES**

1. The Notice of Opposition fails to state a claim upon which relief can be granted.
2. Opposer has not used or is not using the phrase “rightsourcing” as source-identifying trademark.
3. The term “rightsourcing” is or has become generic for outsourcing or placement services.
4. Applicant reserves the right to add additional affirmative defenses after conducting discovery and further factual investigation.

WHEREFORE, Applicant requests that Opposition No. 91220767 be dismissed and that US Trademark Application No. 86184957 be approved for registration on the Principal Register.

April 3, 2015

Respectfully Submitted,  
SEYFARTH SHAW LLP

/NIGAMNARAYAN ACHARYA/

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**PROOF OF SERVICE**

I certify that on April 3, 2015, I served a copy of the document entitled

**APPLICANT'S ANSWER AND AFFIRMATIVE DEFENSES**

on counsel for Opposer by depositing a true and correct copy of the document with the United States Postal Service, first class mail, postage prepaid, in an envelope addressed as follows:

Stephen L. Davis  
Davis & Leonard LLP  
8880 Cal Center Dr., Suite 180  
Sacramento, CA 95826

/Nigamnarayan Acharya/  
Nigamnarayan Acharya