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

Proceeding	91227079
Party	Defendant Baker Hughes Incorporated
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Submission	Answer
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Date	05/03/2016
Attachments	SENTRYNET-Answer.pdf(12040 bytes)

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

SUMMIT ESP, LLC	§	
	§	Opposition No. 91227079
Opposer,	§	
	§	Application Serial No. 86/722,768
v.	§	
	§	Filed: August 12, 2015
BAKER HUGHES INCORPORATED,	§	
	§	Mark: SENTRYNET
Applicant	§	
	§	Published: December 1, 2015

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

In response to the Notice of Opposition filed by Opposer Summit ESP, LLC (“Opposer”), Applicant Baker Hughes Incorporated (“Baker Hughes”) answers as follows:

To the extent an answer is required to the statements made in the introductory paragraph on page 1 of the Notice of Opposition, Baker Hughes admits that Opposer is opposing the registration of Baker Hughes’ Application Serial No. 86/722,768, filed August 12, 2015. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in the introductory paragraph on page 1 of the Notice of Opposition and, thus, denies all of the remaining allegations within the introductory paragraph on page 1 of the Notice of Opposition.

1. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 1 of the Notice of Opposition and, thus, denies all of the allegations contained in paragraph 1 of the Notice of Opposition.

2. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 2 of the Notice of Opposition and, thus, denies all of the allegations contained in paragraph 2 of the Notice of Opposition.

3. Baker Hughes admits that Opposer is a competitor of Baker Hughes and that Baker Hughes sells products and services in the artificial lift industry in the United States as alleged in paragraph 3 of the Notice of Opposition. Baker Hughes denies the remaining allegations contained in paragraph 3 of the Notice of Opposition.

4. Baker Hughes admits the allegations contained in paragraph 4 of the Notice of Opposition.

5. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 5 of the Notice of Opposition and, thus, denies all of the allegations contained in paragraph 5 of the Notice of Opposition.

6. Baker Hughes admits the allegations contained in paragraph 6 of the Notice of Opposition.

7. Baker Hughes admits the allegations contained in paragraph 7 of the Notice of Opposition.

8. Baker Hughes denies the allegations contained in paragraph 8 of the Notice of Opposition.

9. Baker Hughes denies the allegations contained in paragraph 8 of the Notice of Opposition.

10. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 10 of the Notice of Opposition and, thus, denies all of the allegations contained in paragraph 10 of the Notice of Opposition.

11. Baker Hughes is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 11 of the Notice of Opposition and, thus, denies all of the allegations contained in paragraph 11 of the Notice of Opposition.

To the extent the Notice of Opposition includes any allegation outside of the introductory paragraph and numbered paragraphs 1-11, and thus, requires a response, Baker Hughes denies all such additional or remaining allegations, including denial of Opposer's requested relief.

PRAYER

WHEREFORE, Applicant Baker Hughes Incorporated prays that Opposer's Notice of Opposition be dismissed, that registration based on U.S. Trademark Application Serial No. 86/722,768 be issued, and that Applicant Baker Hughes Incorporated be granted all other relief, in law or equity, to which it is entitled.

Respectfully submitted,

Dated: May 3, 2016

/Anthony F. Matheny/
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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2016, a true and correct copy of the foregoing Applicant's Answer to Notice of Opposition was served by first class mail, postage prepaid, and e-mail on the following:

Penina Michlin Chiu
John D. Clayman
Frederic Dorwart, Lawyers
Old City Hall
124 East Fourth Street
Tulsa, Oklahoma 74103

/Anthony F. Matheny/