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By Federal Express

April 6, 2016

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**Board Certified Real Estate
***Board Certified Business Litigation

Trademark Trial and Appeal Board
Madison East
600 Dulany Street
Alexandria, VA 22314

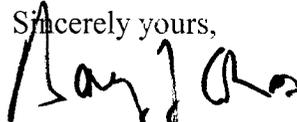
Re: Application for mark, "First Step"
 Serial Number 867746691
 Notice of Opposition

Ladies and Gentlemen:

Enclosed for filing please find the following for the above referenced Trademark application:

1. Notice of Opposition of First Step Detox, LLC
2. Proof of Service of Opposition on trademark applicant; and
3. Check in amount of \$300 for filing fee

Sincerely yours,



Gary J. Cohan



U.S. Patent & TMO/TM Mail Rcct Dt. #22

A PARTNERSHIP OF PROFESSIONAL ASSOCIATIONS

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

In the matter of trademark application Serial Number 86774691

For the mark: **FIRST STEP**

Published in the Official Gazette on March 8, 2016

FIRST STEP DETOX, LLC, a Florida limited liability company, d/b/a First Step Medical Detox, **Opposer**

v.

THE FIRST STEP HEALTH FOUNDATION INC. USA, a Florida corporation, **Applicant**

NOTICE OF OPPOSITION

FIRST STEP DETOX, LLC
d/b/a/ **First Step Medical Detox**
2901 Broadway
West Palm Beach, FL 33407

The above identified **Opposer** believes that it will be damaged by registration of the mark shown in the above identified application, and hereby opposes the same.

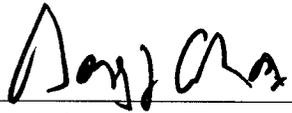
The grounds for opposition are as follows:

1. **Opposer** and its predecessor have used the service mark, **First Step** (the “**Mark**”), in commerce for marketing rehabilitation and counseling of drug and alcohol addicted client services since at least October 14, 2014. **Opposer** first went live with its website entitled “**First Step** Medical Detox,” in December 2014. **Opposer** was organized as a Florida limited liability company on January 14, 2015 and has been operating a drug and alcohol addiction detoxification center since March 18, 2016. **Opposer** has invested more than \$1,100,000.00 in its website and physical facilities located in Palm Beach, Florida.

2. **Applicant** was organized on March 3, 2015 and, upon information and belief, did not use the **Mark** in commerce at any time prior thereto. **Applicant** has a website entitled "First Step.com," which purports to offer clients drug detoxification services and apparently went live on or about November 1, 2015. **Applicant's** website contains a banner at the top with a telephone number and the words "Opening Soon." A person answering a telephone call to the listed number informs the caller that its facility is undergoing renovation will be opening in a few weeks. Upon information and belief, **Applicant** is still not offering its claimed services in commerce.
3. **Applicant's** use of the **Mark** in conjunction with the marketing or sales of services similar or identical to services marketed and sold by **Opposer** will result in certain or a substantial likelihood of confusion between the services of **Opposer** and those of **Applicant**, thereby causing significant damage to the market value and good will of **Opposer's** service mark.

Wherefore **Opposer** hereby requests that registration of the mark shown in the above-referenced application be denied.

FIRST STEP DETOX, LLC

By: 
Gary J. Cohan, Esq., its attorney

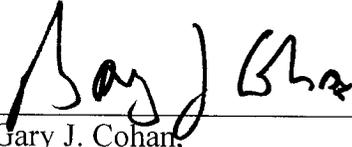
Date: April 6, 2016

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Opposition has been served by U.S. Mail to David L. Sigalow, Esq., Attorney for Applicant, The First Step Health Foundation Inc., this 6th day of April, 2016.

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By: 
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Attorney for Opposer