

ESTTA Tracking number: **ESTTA775730**

Filing date: **10/10/2016**

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

Proceeding	91229788
Party	Defendant D.H.S. WE CARE INC.
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Date	10/10/2016
Attachments	We Care For Life Answer.pdf(42522 bytes)

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

FRESENIUS KABI AG Opposer, v. D.H.S. WE CARE INC. Applicant.	Opposition No. 91229788 MARK: WE CARE FOR LIFE Application No. 86/670,780 Published: March 01, 2016
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APPLICANT'S ANSWER TO OPPOSER'S NOTICE OF OPPOSITION

Applicant D.H.S. WE CARE INC ("Applicant") hereby submits this answer to the Notice of Opposition ("Notice"), filed August 29, 2016, of FRESENIUS KABI AG ("Opposer") as follows:

1. Applicant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 1 of the Notice, and on that basis denies such allegations.

2. Applicant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 2 of the Notice, and on that basis denies such allegations.

3. Applicant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 3 of the Notice, and on that basis denies such allegations.

4. Applicant admits the allegations of Paragraph 4 of the Notice.

5. Applicant admits that the records of the Trademark Status and Document Retrieval ("TSDR") of the United States Patent and Trademark Office ("USPTO") reflect that Applicant owns U.S. Serial Number 86670780, and that said application was filed on an Intent to Use basis for "Nutritional supplements" in International Class 005.

6. Applicant admits that the Application was published in the Official Gazette of the USPTO on March 1, 2016. As to the remaining allegations, Applicant is without sufficient information or knowledge to admit or deny, and on that basis denies such allegations.

7. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 7 of the Petition, and on that basis denies such allegations.

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

9. Applicant denies the allegations contained in Paragraph 9 of the Notice.

10. Applicant denies the allegations contained in Paragraph 10 of the Notice.

PRAYER FOR RELIEF

WHEREFORE, Applicant contends that the Notice of Opposition is without grounds and respectfully requests that the Notice of Opposition be dismissed in its entirety with prejudice.

Dated: October 10, 2016

Respectfully Submitted,

By: /s/ Jessica Tam
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of APPLICANT'S ANSWER TO OPPOSER'S NOTICE OF OPPOSITION is being served by mailing a copy thereof, first class USPS addressed to the following individuals, identified in the Notice of Opposition as the attorneys of record and correspondents on October 10, 2016:

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