



01-30-2002

U.S. Patent & TMO/c/TM Mail Rcpt Dt. #58

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

Re: Registration No. 2,122,225
Mark: CROSS COUNTRY STAFFING

-----X
THE CROSS COUNTRY GROUP, LLC

Petitioner,

v.

CFRC, INC. (by assignments from CCHP, Inc.)

Registrant.
-----X

Cancellation No. 32,581

BOX TTAB - No Fee
Commissioner for Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3513

ANSWER

Registrant CFRC, Inc., by its attorneys, Proskauer Rose LLP, answers the Petition for Cancellation in the above-captioned proceeding as follows:

1. Lacks sufficient information to form a belief as to the truth of the allegations in Paragraph 1.
2. Denies the allegations in Paragraph 2.
3. Denies the allegations in Paragraph 3.
4. Denies the allegations in Paragraph 4.
5. Denies the allegations in Paragraph 5.
6. Denies the allegations in Paragraph 6.
7. Denies the allegations in Paragraph 7.

FIRST AFFIRMATIVE DEFENSE

8. There is no likelihood of confusion.

SECOND AFFIRMATIVE DEFENSE

9. Petitioner's marks are not famous.

THIRD AFFIRMATIVE DEFENSE

10. There is no dilution and no violation of the Anti-dilution Act.

FOURTH AFFIRMATIVE DEFENSE

11. Petitioner's claims are barred by the doctrines of laches and estoppel.

WHEREFORE, Registrant prays for an order dismissing the Petition for Cancellation with prejudice.

Respectfully submitted,

Dated: January 30, 2002

PROSKAUER ROSE LLP

By: Gregg Reed
Gregg Reed
1585 Broadway
New York, New York 10036
(212) 969-3000

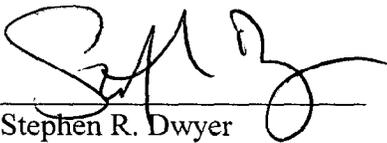
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STEPHEN R. DWYER
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(Signature of Person Mailing Paper or Fee)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document, entitled ANSWER, is being served by first-class mail, postage prepaid, to counsel of record for Petitioner The Cross Country Group, LLC:

Carole A. Boelitz
Wolf, Greenfield & Sacks, P.C.
600 Atlantic Ave.
Federal Reserve Plaza
Boston, MA, 02210

Dated: January 30, 2002


Stephen R. Dwyer