

ESTTA Tracking number: **ESTTA53640**

Filing date: **11/16/2005**

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

<b>Proceeding</b>	91166901
<b>Party</b>	Defendant Accident Fund Insurance Company Of America Accident Fund Insurance Company Of America P.O. Box 40790 232 S. Capitol Avenue Lansing, MI 48901
<b>Correspondence Address</b>	Marc A. Bergsman Dickinson Wright PLLC Suite 800 1901 L Street, N.W. Washington, DC 20036
<b>Submission</b>	Answer
<b>Filer's Name</b>	Marc A. Bergsman
<b>Filer's e-mail</b>	MBergsman@dickinsonwright.com
<b>Signature</b>	/Marc A. Bergsman/
<b>Date</b>	11/16/2005
<b>Attachments</b>	af answer.tif ( 4 pages )

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

<b>AMERICAN FIDELITY CORPORATION,</b>	)	
	)	
<b>AMERICAN FIDELITY ASSURANCE CORPORATION,</b>	)	
	)	
Opposers,	)	
	)	
v.	)	Opposition No. 91166901
	)	
<b>ACCIDENT FUND INSURANCE COMPANY OF AMERICA,</b>	)	
	)	
Applicant.	)	

**ANSWER**

1. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 1 of the Notice of Opposition.
  
2. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 2 of the Notice of Opposition.
  
3. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 3 of the Notice of Opposition.
  
4. Applicant admits the averment in Paragraph No. 4 of the Notice of Opposition.
  
5. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 5 of the Notice of Opposition.

6. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 6 of the Notice of Opposition.

7. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 7 of the Notice of Opposition.

8. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 8 of the Notice of Opposition.

9. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 9 of the Notice of Opposition.

10. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 10 of the Notice of Opposition.

11. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 11 of the Notice of Opposition.

12. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 12 of the Notice of Opposition.

13. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 13 of the Notice of Opposition.

14. Applicant admits the averments in Paragraph No. 14 of the Notice of Opposition.
15. Applicant admits the averments in Paragraph No. 15 of the Notice of Opposition.
16. Applicant denies the averments in Paragraph No. 16 of the Notice of Opposition.
17. Applicant denies the averments in Paragraph No. 17 of the Notice of Opposition.
18. Applicant is without knowledge or information sufficient to form a belief as the truth of the averments in paragraph No. 18 of the Notice of Opposition.

Applicant respectfully submits that the Notice of Opposition should be dismissed with prejudice.

**ACCIDENT FUND INSURANCE  
COMPANY OF AMERICA**

Date: November 16, 2005

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Attorneys For Applicant

### Certificate of Service

I hereby certify that on this 16<sup>th</sup> day of November, 2005, Applicant's **ANSWER** was served on counsel for Opposer via e-mail and first-class mail, postage prepaid, at the following address:

Glen M. Burdick, Esq.  
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/Marc A. Bergsman/