

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

In the matter of Trademark Application Serial No. 85/793,515  
Filed December 3, 2012  
For the mark PALADERM

Paladerm, LLC	)
	)
Applicant	)
	)
v.	)
	)
Fougera Pharmaceuticals, Inc.	)
	)
Opponent	)

ANSWER

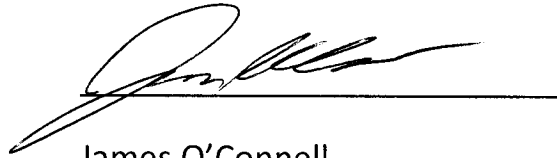
In response to the Opposition filed by Fougera Pharmaceuticals and in support of Applicant Paladerm, LLC's application, Applicant answers:

1. Admitted
2. Denied. Opponent's bald claim of harm is unsupported in the Opposition and in fact.
3. Applicant lacks sufficient information to admit or deny.
4. Applicant lacks sufficient information to admit or deny.
5. Denied. Applicant's Mark is so substantially different from Opponent's Mark as to render any potential confusion inconceivable. The prefix "Pala" invokes the Paladins of lore, while the prefix "Pharma" is associated with drugs and the drug industry. Opponent's claim is meritless to the point of frivolity.

WHEREFORE, Applicant prays that the Opposition be dismissed and the application be approved.

Done this 23<sup>rd</sup> day of October, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James O'Connell", is written over a solid horizontal line.

James O'Connell

Attorney for PALADERM, LLC

6225 Cahaba Valley Rd

Birmingham, AL 35242

**CERTIFICATE OF SERVICE**

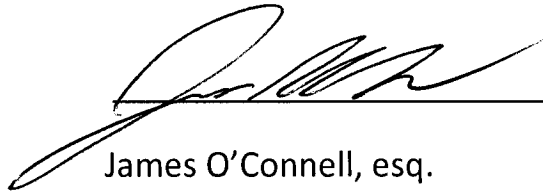
I hereby certify that I have on this 23<sup>rd</sup> day of October, 2013 served a copy of the foregoing document to the persons named below by mailing the same by United States Postal Service, properly addressed, and first class postage prepaid:

Maury M. Tepper, III

Tepper & Eyster PLLC

3724 Benson Drive

Raleigh, NC 27609



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James O'Connell, esq.