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

Proceeding	91224422
Party	Defendant LEE HECHT HARRISON, LLC
Correspondence Address	Ava K. Doppelt Allen, Dyer, Doppelt, Milbrath & Gilchri 255 S. Orange Avenue, Suite 1401 Orlando, FL 32801  adoppelt@addmg.com
Submission	Answer
Filer's Name	Ava K. Doppelt
Filer's e-mail	adoppelt@addmg.com, spayne@addmg.com
Signature	/Ava K. Doppelt/
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

CareerBuilder, LLC,	)	Opposition No. 91224422
	)	
Opposer,	)	Application No. 86/134485
	)	
v.	)	
	)	
	)	
Lee Hecht Harrison, LLC,	)	
	)	
Applicant.	)	
	)	
	)	
	)	
	)	
	)	

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**APPLICANT’S ANSWER AND AFFIRMATIVE DEFENSES**  
**TO NOTICE OF OPPOSITION**

Lee Hecht Harrison, LLC (“LHH”), through its undersigned counsel, hereby submits its Answer and Affirmative Defenses to the Notice of Opposition (“Opposition”) filed by CareerBuilder, LLC (“CareerBuilder”), and states as follows:

Introduction. LHH denies that CareerBuilder will be damaged by the registration of LHH’s mark (“the Mark”), and that there are any grounds for opposition thereof.

1. LHH is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 1 of the Opposition, and based upon such lack of knowledge or information it hereby denies same.

2. LHH is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 2 of the Opposition, and based upon such lack of knowledge or information it hereby denies same.

3. LHH is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 3 of the Opposition, and based upon such lack of knowledge or information it hereby denies same.

4. LHH is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 4 of the Opposition, and based upon such lack of knowledge or information it hereby denies same.

5. Admitted that CareerBuilder timely filed this Notice of Opposition after first receiving an extension of time. LHH denies all other allegations in Paragraph 5 of the Opposition. LHH notes that the application for TALENTBUILDER, Application Serial No. 86/134485 (“the Application”) was filed on December 4, 2013 by MasteryWorks, Inc. On September 25, 2014 the assignment of the Application to LHH was recorded in the United States Patent and Trademark Office.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

10. LHH denies all the allegations that are not expressly admitted hererin, and denies that its Mark should not be registered.

#### **AFFIRMATIVE DEFENSES**

1. The Mark is not confusingly similar to any of CareerBuilder’s mark.

2. There is no likelihood of confusion between CareerBuilder’s mark and the mark shown in the Application.

3. CareerBuilder is barred by laches, estoppel, acquiescence and waiver from opposing the Application.

4. CareerBuilder will not be damaged by the registration of the mark show in the Application.

WHEREFORE, LHH respectfully requests that the Opposition be dismissed with prejudice, and that its Application proceed to registration on the Principal Register.

Dated: November 30, 2015

Respectfully Submitted,

/Ava K. Doppelt/

Ava K. Doppelt, Esq.  
Allen, Dyer, Doppelt, Milbrath  
& Gilchrist, P.A.  
255 South Orange Avenue  
Orlando, Florida 32801  
Telephone: (407) 841-2330  
Facsimile: (407) 841-2343  
Email: adoppelt@addmg.com

***Attorney for Applicant  
Lee Hecht Harrison, LLC***

**Certificate of Service**

The undersigned hereby certifies that on November 30, 2015, a copy of the foregoing was served via First Class mail on the following:

Jessica Rissman Cohen, Esq.  
Neal, Gerber & Eisenberg, LLP  
Two North LaSalle Street, Suite 1700  
Chicago, IL 60602-3801

***Attorney for Opposer  
CareerBuilder, LLC***

/Stephanie Simmons/ \_\_\_\_\_  
Stephanie Simmons, Paralegal