

ESTTA Tracking number: **ESTTA818617**

Filing date: **05/03/2017**

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

Proceeding	91233597
Party	Defendant Halliburton Energy Services, Inc.
Correspondence Address	SCOTT RICHARDSON HALLIBURTON ENERGY SERVICES, INC. 2601 E. BELT LINE ROAD CARROLLTON, TX 75006-5401  FTMLEGAL@halliburton.com
Submission	Answer
Filer's Name	Jeffrey M. Becker
Filer's e-mail	jeff.becker@haynesboone.com
Signature	/Jeffrey M. Becker/
Date	05/03/2017
Attachments	OP SIS Answer.pdf(89685 bytes )

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

<b>Opsis AB,</b>	§	<b>Opposition No.: 91233597</b>
Opposer,	§	
v.	§	
<b>Halliburton Energy Services, Inc.,</b>	§	Mark: OPSIS
Applicant.	§	Serial No.: 86/942,515

**APPLICANT’S ANSWER TO NOTICE OF OPPOSITION**

Applicant, Halliburton Energy Services, Inc., by its attorneys, hereby submits its Answer to the Notice of Opposition filed by Opsis AB on March 22, 2017, against application for registration of Applicant’s trademark OPSIS, Serial No. 86/942,515 (“Applicant’s Mark”) as set forth below.

With respect to the ESTTA-generated filing form, Applicant admits that its mailing address of record is 2601 E. Belt Line Road, Carrollton, TX 75006-5401 and that it owns Application Serial No. 86/942,515 for the mark OPSIS. As to the grounds for the opposition, Applicant denies all such allegations and claims and denies that Opposer has been or will be damaged by registration of Applicant’s Mark. Applicant lacks sufficient information to form a belief as to the truth or falsity of the remaining allegations in the ESTTA-generated filing form, and therefore denies them.

Regarding the preamble of the Notice of Opposition, Applicant denies that Opposer has or will be damaged by registration of Applicant’s Mark.

Regarding the numbered Paragraphs of the Notice of Opposition, Applicant responds as follows:

I. In response to paragraph 1 of the Notice of Opposition, Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and accordingly denies each and every such allegation.

2. In response to paragraph 2 of the Notice of Opposition, Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and accordingly denies each and every such allegation.

3. In response to paragraph 3 of the Notice of Opposition, Applicant admits the allegation therein.

4. In response to paragraph 4 of the Notice of Opposition, Applicant denies the allegations contained therein.

5. In response to paragraph 5 of the Notice of Opposition, Applicant denies the allegations contained therein.

6. In response to paragraph 6 of the Notice of Opposition, Applicant denies the allegations contained therein.

#### AFFIRMATIVE ALLEGATIONS AND AMPLIFICATIONS OF DENIALS

7. Applicant is one of the world's largest providers of products and services to the energy industry.

8. Applicant's use of the mark OPSIS in connection with its highly technical, specialized, and expensive gauges used in harsh downhole oil and gas well environments is not likely to cause confusion, or to cause mistake, or to deceive under Section 2(d) of the Lanham Act with respect to Opposer's use of the mark OPSIS for its highly technical, specialized, and likely expensive "monitoring systems for ambient air quality monitoring, continuous emissions monitoring and process control applications."

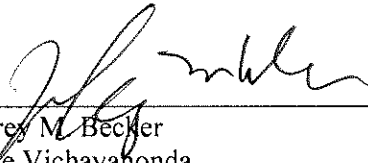
9. There are a number of third parties using the mark OPSIS for a wide variety of goods and services, thus the mark OPSIS does not point uniquely and unmistakably to Opposer. Thus, Applicant's mark does not falsely suggest a connection with Opposer under Section 2(a) of the Lanham Act.

AFFIRMATIVE DEFENSES

10. Applicant reserves the right to amend this Answer and to assert additional defenses, as well as to supplement, alter, or change its answer and defenses upon the discovery of additional facts.

WHEREFORE, Applicant contends that this Opposition is groundless and baseless in fact and that Opposer has not shown how it will be, or is likely to be, damaged by the registration of Applicant's Mark. Applicant denies that Opposer will be damaged in any manner by registration of Applicant's Mark, denies that Opposer is entitled to any of the relief requested in the Notice of Opposition, and requests that this Opposition be dismissed and Applicant be granted registration of its application.

Respectfully submitted,



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Jeffrey M. Becker  
Anjie Vichayanonda  
HAYNES AND BOONE, LLP  
*Attorneys for Applicant*

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Opsis AB,

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Opposition No.: 91233597

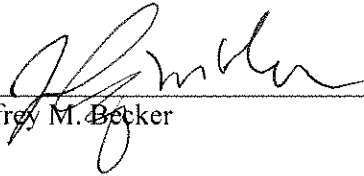
Mark: OPSIS

Serial No.: 86/942,515

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3<sup>rd</sup> day of May 2017, a copy of the foregoing *Applicant's Answer to Notice of Opposition* was served on Opposer's counsel of record, via email to the following email address of record:

ehrllich-docket@fzlj.com

  
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Jeffrey M. Becker