

ESTTA Tracking number: **ESTTA928640**

Filing date: **10/15/2018**

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

Proceeding	91241340
Party	Defendant Sanofi Biotechnology
Correspondence Address	SUSAN UPTON DOUGLASS FROSS ZELNICK LEHRMAN & ZISSU PC 4 TIMES SQUARE, 17TH FLOOR NEW YORK, NY 10036 UNITED STATES sdouglass@fzlz.com 212-813-5900
Submission	Answer
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Date	10/15/2018
Attachments	F2788854.PDF(124481 bytes)

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

ADVENTIST HEALTH SYSTEM SUNBELT
HEALTHCARE CORPORATION

Opposer,

v.

SANOFI BIOTECHNOLOGY,

Applicant.

Opposition No.: 91241340

ANSWER

Applicant, by its undersigned attorneys, answers the Notice of Opposition as follows.

1. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 1 of the Notice of Opposition.
2. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 2 of the Notice of Opposition.
3. Applicant denies the allegations in Paragraph 3 of the Notice of Opposition, except admits that Sanofi US has an office in Bridgewater, New Jersey and that there are more than 14,000 Sanofi employees in the United States.
4. Applicant admits the allegations in Paragraph 4 of the Notice of Opposition.
5. Applicant admits the allegations in Paragraph 5 of the Notice of Opposition.
6. Applicant admits the allegations in Paragraph 6 of the Notice of Opposition, except lacks knowledge or information sufficient to form a belief about the truth of the allegations concerning the date of first use of Opposer's Marks.
7. Applicant denies the allegations in Paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations in Paragraph 8 of the Notice of Opposition.
9. Applicant denies the allegations in Paragraph 9 of the Notice of Opposition.
10. Applicant denies the allegations in Paragraph 10 of the Notice of Opposition.
11. Applicant denies the allegations in Paragraph 11 of the Notice of Opposition.
12. Applicant denies the allegations in Paragraph 12 of the Notice of Opposition.
13. Applicant denies the allegations in Paragraph 13 of the Notice of Opposition, except admits the allegations in the first two sentences of that paragraph.
14. Applicant denies the allegations in Paragraph 14 of the Notice of Opposition.

WHEREFORE, Applicant respectfully requests that judgment be entered in its favor, dismissing the Notice of Opposition in its entirety and granting such other and further relief as the Board deems just and proper.

Dated: New York, New York
October 15, 2018

FROSS ZELNICK LEHRMAN
& ZISSU, P.C.

By: /Richard Lehv/
Richard Lehv
Attorneys for Applicant
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New York, New York 10036
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Certificate of Service

I hereby certify that the foregoing stipulation is being served by email on Bryan P. Stanley, counsel for Opposer, on October 15, 2018 at Bryan.Stanley@KutakRock.com.

/Richard Lehv/
Richard Lehv