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

Proceeding	91242497
Party	Defendant Parker Drilling Company
Correspondence Address	MARK G. KACHIGIAN HEAD, JOHNSON, KACHIGIAN & WILKINSON, PC 228 W. 17TH PL TULSA, OK 74119 mkachigian@hjkwlaw.com no phone number provided
Submission	Answer
Filer's Name	Mark G. Kachigian
Filer's email	mkachigian@hjkwlaw.com
Signature	/markgkachigian/
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Attachments	Applicants Answer to Notice of Opposition.pdf(234663 bytes)

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

PARKER INTANGIBLES LLC)	
)	
Opposer)	
)	
v.)	Opposition No. 91242497
)	Serial Nos. 87/751,624 and 87/751,576
PARKER DRILLING COMPANY)	
)	
Applicant.)	

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Parker Drilling Company (“Parker” or “Applicant”), a Delaware corporation located and doing business at 5 Greenway Plaza, Suite 100, Houston, Texas 77046, and owner of U.S. Trademark Application Serial No. 87/751,624 for the trademark **PARKER** and Design and U.S. Trademark Application Serial No. 87/751,576 for the trademark **PARKER THE STRENGTH BEHIND ENERGY** and Design, by and through its counsel, answers the allegations in the Notice of Opposition filed by Parker Intangibles LLC (“Opposer”) as follows:

1. Applicant admits that it filed a trademark application, Serial No. 87/751,624, to register the mark **PARKER** with a drill bit logo and admits the allegations contained in paragraph 1 of the Notice of Opposition.
2. Applicant admits that it filed a trademark application, Serial No. 87/751,576, to register the mark **PARKER THE STRENGTH BEHIND ENERGY** with a drill bit logo and admits the allegations contained in paragraph 1 of the Notice of Opposition.
3. Applicant admits the allegations contained in paragraph 3 of the Notice of Opposition.

4. Applicant admits the allegations of paragraph 4 of the Notice of Opposition.

5. Applicant admits that Applicant's pending applications cover the products and services listed in paragraph 5 of the Notice of Opposition.

6. Applicant admits the allegations of paragraph 6 of the Notice of Opposition.

7. Applicant denies the allegations of paragraph 7 of the Notice of Opposition.

Applicant specifically denies that Opposer is engaged in "the manufacturing of motion and control technologies" and denies that any party could be "engaged in the manufacturing of motion and control technologies."

8. Applicant denies the allegations of paragraph 8 of the Notice of Opposition and specifically denies that Opposer uses or is the owner of any of the marks alleged therein.

9. Applicant is without sufficient knowledge or information and, accordingly, denies the allegations contained in paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations of paragraph 10 of the Notice of Opposition. In particular, Applicant denies that Opposer has any priority.

11. Applicant denies the allegations of paragraph 11 of the Notice of Opposition and specifically denies that Applicant's stylized presentations in its applications are similar to Opposer's alleged marks.

12. Applicant denies the allegations of paragraph 12 of the Notice of Opposition and specifically denies any likelihood of confusion.

13. Applicant denies the allegations of paragraph 13 of the Notice of Opposition and specifically denies any likelihood of confusion or mistake.

14. Applicant denies the allegations of paragraph 14 of the Notice of Opposition. In particular, while Applicant admits it operates and has operated under the designation Parker

Drilling, it has also operated for decades under the designation and trademark “PARKER”. Applicant also specifically denies any likelihood of confusion or mistake or deception.

Affirmative Defenses

15. Opposer has failed to state any grounds upon which an opposition may be based. In particular, the Opposer does not appear to utilize any of the trademarks alleged in the Notice of Opposition and accordingly lacks standing to proceed with the present opposition.

16. Applicant is the owner of valid and incontestable U.S. trademark registration for the word term **PARKER** (U.S. Registration No. 1,181,601) registered in 1981. Applicant’s registered trademark for the word term **PARKER** has been used since at least 1934. Applicant’s extensive and continuous use of its trademark and incontestable trademark registration give it significant rights to the word term **PARKER** for its particular businesses.

The Applicant denies any likelihood of confusion, mistake or deception between Opposer’s alleged marks and its own and prays that Opposer’s opposition be denied and that registrations of pending U.S. Application Serial Nos. 87/751,624 and 87/751,576 be granted.

Respectfully submitted,

HEAD, JOHNSON, KACHIGIAN & WILKINSON, PC

Date: August 28, 2018

By: 
Mark G. Kachigian, Reg. No. 32,840
228 West 17th Place
Tulsa, Oklahoma 74119
Telephone: (918) 587-2000
Facsimile: (918) 584-1718
mkachigian@hjkwlaw.com
ATTORNEYS FOR APPLICANT
PARKER DRILLING COMPANY

CERTIFICATE OF SERVICE

This will certify that on this 28th day of August, 2018, a true and correct copy of the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION was electronically transmitted via e-mail and also mailed, first class, postage prepaid to:

Robert J. Clark
6035 Parkland Boulevard
Cleveland, Ohio 44124
rclark@parker.com
erin.thompson@parker.com



Mark G. Kachigian