

ESTTA Tracking number: **ESTTA1015154**

Filing date: **11/12/2019**

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

Proceeding	91251376
Party	Defendant IGT Global Solutions Corporation
Correspondence Address	DENISE TALIAFERRO IGT GLOBAL SOLUTIONS CORPORATION 10 MEMORIAL BOULEVARD TRADEMARK DEPARTMENT PROVIDENCE, RI 02903 trademarks@igt.com no phone number provided
Submission	Answer
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Date	11/12/2019
Attachments	Answer -- Cromulent Labs CROSSWORD CONNECT.pdf(165322 bytes)

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

Cromulent Labs, Inc.,	:	
Opposer,	:	
	:	
	:	Opposition No. 91251376
v.	:	
	:	
IGT Global Solutions Corp.	:	
Applicant.	:	

Application Serial No.	:	88/149,497
Filed	:	October 10, 2018
Published for Opposition	:	September 3, 2019
Mark	:	CROSSWORD CONNECT

Commissioner for Trademarks
Trademark Trial and Appeal Board
PO Box 1451
Alexandria, VA 22313-1451

ANSWER

Applicant IGT Global Solutions Corp., a Delaware corporation (“Applicant”), hereby answers the Notice of Opposition filed by Cromulent Labs, Inc. (“Opposer”), as follows:

1. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 1 of the Notice of Opposition are denied.

2. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 2 of the Notice of Opposition are denied.
3. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 3 of the Notice of Opposition are denied.
4. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 4 of the Notice of Opposition are denied.
5. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 5 of the Notice of Opposition are denied.
6. The allegations of Paragraph 6 of the Notice of Opposition are admitted.
7. The allegations of Paragraph 7 of the Notice of Opposition are admitted.
8. The allegations of Paragraph 8 of the Notice of Opposition are admitted.
9. The allegations of Paragraph 9 of the Notice of Opposition are denied.
10. Paragraph 10 of the Notice of Opposition does not include any allegations requiring a response from Applicant.
11. Applicant admits that Applicant's CROSSWORD CONNECT mark consists of standard characters without claim to any particular font style, size, or color. The remaining allegations of Paragraph 11 of the Notice of Opposition are denied.
12. The allegations of Paragraph 12 of the Notice of Opposition are admitted.

13. Applicant admits that the identification of goods in Applicant's application is for "Lottery tickets; Scratch cards for playing lottery games" in International Class 28.
The remaining allegations of Paragraph 13 of the Notice of Opposition are denied.
14. The allegations of Paragraph 14 of the Notice of Opposition are admitted.
15. The allegations of Paragraph 15 of the Notice of Opposition are admitted.
16. Paragraph 16 of the Notice of Opposition does not include any factual allegations requiring a response from Applicant. Paragraph 16 includes Opposer's disagreement with a statement made by Applicant during prosecution of its application. Applicant admits that the goods associated with Opposer's mark and Applicant's mark are sufficiently different as to not cause confusion. The remaining allegations of Paragraph 16 of the Notice of Opposition are denied.
17. Applicant admits that some games may appear in different forms, such as board games or video games. Applicant lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of Paragraph 17 of the Notice of Opposition and therefore they are denied.
18. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 18 of the Notice of Opposition are denied. Applicant specifically denies the allegation that the examples included in Paragraph 18 are relevant to the present opposition.
19. The allegations of Paragraph 19 of the Notice of Opposition are denied.
20. Applicant lacks knowledge or information sufficient to form a belief about the truth of the allegations, and therefore the allegations of Paragraph 20 of the Notice of

Opposition are denied. Applicant specifically denies the allegation that Applicant's mark would cause confusion in the relevant marketplace, would be detrimental to and injure Opposer's reputation, and goodwill associated with its mark, and would cause damage to Opposer.

21. The allegations of Paragraph 21 of the Notice of Opposition are denied.

Respectfully submitted,

SAGE PATENT GROUP, PLLC

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Attorneys for Applicant

Dated: November 12, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served on counsel for Opposer Cromulent Labs, Inc. by forwarding said copy on November 12, 2019 via email to:

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