

ESTTA Tracking number: **ESTTA1467909**Filing date: **10/07/2025**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91301336
Party	Defendant Healthcare Information and Management Systems Society
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Date	10/07/2025
Attachments	AMAM Answer to Opposition.pdf(137931 bytes )

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

American Medical Association,

Opposer,

v.

Healthcare Information and Management  
Systems Society

Applicant.

Opposition No.: 91301336

Mark: AMAM

Serial No.: 98311435

**ANSWER TO NOTICE OF OPPOSITION**

Healthcare Information and Management Systems Society (“Applicant”) hereby answers the allegations set forth in the Notice of Opposition filed by the American Medical Association (“Opposer”) against U.S. Application Serial Number 98311435 for the AMAM trademark (the “Application”).

1. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 1 and therefore denies them.
2. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 2 and therefore denies them.
3. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 3 and therefore denies them.
4. Applicant admits that the Application was filed on December 12, 2023, claiming a first use date of January 1, 2016; however, Applicant lacks knowledge or information sufficient to form a belief as to the remaining allegations of Paragraph 4 and therefore denies them.

5. Applicant admits that the registrations listed in Paragraph 5 appear to reflect the current Trademark Office records. Applicant lacks knowledge or information sufficient to form a belief as to the remaining allegations of Paragraph 5 and therefore denies them.
6. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 6 and therefore denies them.
7. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 7 and therefore denies them.
8. Applicant lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 8 and therefore denies them.
9. Applicant admits that the Application has a filing date of December 12, 2023 and claims a first use date of January 1, 2016; however, Applicant is without knowledge or information sufficient to form a belief as to the remaining allegations in paragraph 9 and therefore denies them.
10. Applicant denies the allegations of paragraph 10.
11. Applicant admits that it filed the Application on December 12, 2023 with the services listed in the Application, as alleged in paragraph 11.
12. Applicant admits the allegations of paragraph 12.
13. Applicant admits that the AMAM trademark consists of the three letter “a” “m” “a”. Applicant explicitly denies that AMAM is confusingly similar to “AMA” or the vaguely defined “AMA Marks” in Opposer’s Notice of Opposition.
14. Applicant denies the allegations of paragraph 14.
15. Applicant denies the allegations of paragraph 15.

16. Upon information and belief, there are no allegations in paragraph 16 to admit or deny, to the extent a response is required, Applicant denies the allegations of paragraph 16.
17. Applicant denies the allegations of paragraph 17.
18. Upon information and belief, there are no allegations in paragraph 18 to admit or deny, to the extent a response is required, Applicant denies the allegations of paragraph 18.
19. Applicant denies the allegations of paragraph 19.
20. Applicant denies the allegations of paragraph 20.

### **AFFIRMATIVE DEFENSES**

1. Opposer is not entitled to the relief sought because of its own history of allowing third parties to use similar marks without proper licenses. Opposer's alleged marks are weak and offered only a limited scope of protection.
2. Opposer's claims are barred by laches, estoppel, acquiescence, and/or unclean hands. Specifically, upon information and belief, Opposer has been aware of Applicant's use of the AMAM trademark for nearly a decade and has made no attempt to stop such use until Opposer contacted Applicant in April 2025.
3. Opposer is not entitled to the relief sought because Opposer's marks are not famous and have never been famous
4. Opposer reserves the right to plead additional affirmative defenses as discovery progresses.

Respectfully submitted,

**BARNES & THORNBURG LLP**

/s/ Casey E. Wright

Date: October 7, 2025

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of this Applicant's Answer has been served on October 7, 2025 via electronic mail to Opposer's attorney of record at tmlit@loeb.com, bfellars@loeb.com, dmasters@loeb.com, and tgilles@loeb.com

/s/ Casey E. Wright  
Casey E. Wright