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Filing date: **06/10/2019**

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

| | |
|------------------------|--|
| Proceeding | 92071179 |
| Party | Defendant Prenexus Health, LLC |
| Correspondence Address | DAAN G. ERIKSON HUSCH BLACKWELL LLP 13330 CALIFORNIA ST. SUITE 200 OMAHA, NE 68154 UNITED STATES pto-om@huschblackwell.com, daan.erikson@huschblackwell.com 402-964-5160 |
| Submission | Answer |
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| Signature | /Daan G. Erikson/ |
| Date | 06/10/2019 |
| Attachments | Answer to Notice of Opposition XOS95 4843-6326-2360 v.2.pdf(146208 bytes) |

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

| | | |
|---------------------------------------|---|---------------------------|
| Life Bridge International Corporation |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Cancellation No. 92071179 |
| |) | |
| Prenexus Health, LLC |) | |
| |) | |
| Registrant. |) | |

PRENEXUS HEALTH'S ANSWER TO PETITION TO CANCEL

Prenexus Health, LLC, now known as Prenexus Health, Inc. ("Prenexus Health"), by and through its undersigned attorneys, provides the following answer and affirmative defenses to Life Bridge International Corporation's ("Petitioner") Petition to Cancel.

1. Prenexus Health is without information sufficient to form a belief as to the truth of the allegation contained in paragraph 1 and accordingly denies the same.
2. Denied.
3. Prenexus Health admits that Petitioner's Exhibits C purports to be a depiction of Prenexus Health's past marketing materials. Except as so expressly admitted, Prenexus Health denies the allegations of paragraph 3.
4. Admitted.
5. Prenexus Health states that the USPTO's Office Action, attached as Exhibit D to Petitioner's Petition, appears to be a true and correct copy from the USPTO's official file wrapper for U.S. Registration No. 5,202,606, and further states that the speaks for itself as to its terms and contents. To the extent that Petition has in any way misrepresented or re-characterized the Office's statements, Prenexus Health denies the same.

6. Prenexus Health states that its response to the USPTO's Office Action (Exhibit D), attached as Exhibit E to Petitioner's Petition, appears to be a true and correct copy from the USPTO's official file wrapper for U.S. Registration No. 5,202,606, and further states that the speaks for itself as to its terms and contents. To the extent that Petition has in any way misrepresented or re-characterized the response, Prenexus Health denies the same.

7. Prenexus Health states that the USPTO's Office Action, attached as Exhibit F to Petitioner's Petition, appears to be a true and correct copy from the USPTO's official file wrapper for U.S. Registration No. 5,202,606, and further states that the speaks for itself as to its terms and contents. To the extent that Petition has in any way misrepresented or re-characterized the Office's statements, Prenexus Health denies the same.

8. Prenexus Health states that its response to the USPTO's Office Action (Exhibit F), attached as Exhibit G to Petitioner's Petition, appears to be a true and correct copy from the USPTO's official file wrapper for U.S. Registration No. 5,202,606, and further states that the speaks for itself as to its terms and contents. To the extent that Petition has in any way misrepresented or re-characterized the response, Prenexus Health denies the same.

9. Prenexus Health is without information sufficient to form a belief as to the truth of the allegation contained in paragraph 9 and accordingly denies the same.

10. Prenexus Health restates and realleges its responses to paragraphs 1-9 of Petitioner's Petition to Cancel as if fully set forth herein.

11. Prenexus Health is without information sufficient to form a belief as to the truth of the allegation contained in paragraph 11 and accordingly denies the same.

12. Prenexus Health restates and realleges its responses to paragraphs 1-11 of Petitioner's Petition to Cancel as if fully set forth herein.

13. Paragraph 13 of Petitioner's Petition contains assertions of law, not statement of facts, and as such no response is required to the same. To the extent that the Board deems any aspect of paragraph 13 to be a statement of fact, the same is denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Prenexus Health restates and realleges its responses to paragraphs 1-18 of Petitioner's Petition to Cancel as if fully set forth herein

20. Denied.

21. Denied.

22. Denied.

23. Prenexus Health is without information sufficient to form a belief as to the truth of the allegation contained in paragraph 23 and accordingly denies the same.

24. Denied.

25. Denied.

26. Denied.

AFFIRMATIVE DEFENSES

1. Prenexus Health's petition fails to state a claim upon which relief may be granted.

2. Respondent reserves the right to assert any and all other affirmative defenses of which it may become aware during the discovery process.

WHEREFORE, Prenexus Health respectfully requests Petitioner's petition to cancel be denied, for its costs herein incurred and expended, and for such other and further relief that the Board deems just and proper.

DATED: June 10, 2019.

Respectfully Submitted,

By: /Daan G. Erikson/
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*Attorneys for Prenexus Health, LLC n/k/a
Prenexus Health, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Respondent's Answer to Petition to Cancel was served upon attorneys for Petitioner at via e-mail at the address noted below this 10th day of June, 2019.

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