

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

EXXON MOBILE CORPORATION,
Opposer

Vs.

ROYAL PURPLE, INC.
Applicant

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Opposition No. 91157273

APPLICANT'S ANSWER TO OPPOSITION

Applicant, ROYAL PURPLE, INC., by its attorney, hereby answers the allegations set forth in opposer Exxon Mobil's NOTICE OF OPPOSITION:

1. Applicant admits that Exxon Mobile Corporation is a New Jersey corporation having its principal place of business at 5959 Las Colinas Boulevard, Irving, Texas, 75039-2298, as alleged in the unnumbered introductory paragraph of its NOTICE OF OPPOSITION but does not have sufficient information to admit or deny whether OPPOSER has any belief that it will be damaged by Applicants registration.
2. Applicant admits the allegations contained in numbered paragraph 1 in as much as they are consistent with the file history of application serial number 75/005,696.
3. Applicant denies the allegations contained in numbered paragraphs 3-5 of OPPOSER'S NOTICE OF OPPOSITION and demands strict proof thereof.
4. Applicant does not have sufficient information to admit or deny whether OPPOSER has any belief as to the allegations contained in numbered paragraph 5 and therefore denies both the fact that OPPOSER has the belief or that the allegations

believed are true and demands strict proof thereof.

5. Applicant denies the allegations contained in numbered paragraph 7 and demands strict proof thereof.

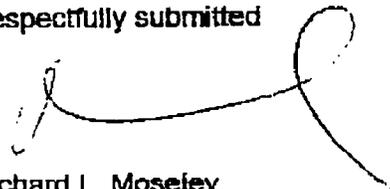
AFFIRMATIVE DEFENSES

6. Due to applicant's long and substantially exclusive use the mark has acquired secondary meaning among the consuming public as an identifier of applicant as a source of the goods for which the registration is sought.

7. Upon information and belief Opposer has only one product, aviation hydraulic fluid, utilizing the color purple and that product is not covered by the application and thus Opposer will not be harmed by the registration.

WHEREFORE, Applicant prays that the opposition be dismissed and that Applicant's application for registration be granted.

Respectfully submitted



Richard L. Moseley
ATTORNEY FOR APPLICANT
ROYAL PURPLE, INC.
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(713)780-7047

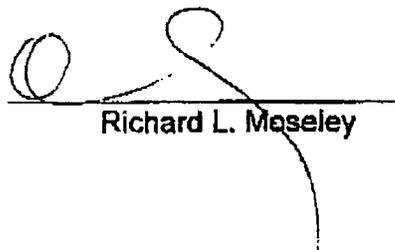
Date 7/1/83

CERTIFICATE OF SERVICE

I hereby certify that OPPOSER is being served with a copy of this document by mailing same via first class mail to its attorney of record, William R. Cohrs at:

Exxon Mobil Corporation
5959 Las Colinas Boulevard
Irving, Texas 77039-2298

on the 15th day of August, 2003.



Richard L. Moseley

TTAB

RICHARD L. MOSELEY

Attorney at Law

P.O. Box 630708

Houston, TX 77263



08-19-2003

U.S. Patent & TMO/TM Mail Rcpt Dt. #22

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*Patent Attorney
Trademark Attorney*

August 15, 2005

Box TTAB
Commissioner for Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3513

RE: Opposition No. 91157273
Serial No. 75/005,969
Exxon Mobil v. Royal Purple, Inc.

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COMMERCIAL MAIL PERMIT NO. 1000 ARLINGTON VA

Dear Madam:

Enclosed for filing in the above referenced case is Applicant's Answer to Opposer's NOTICE OF OPPOSITION.

Please date stamp and return the attached post card.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Richard L. Moseley

enc.
cc: William Cohrs
Fred Kniepp

Certificate of Mailing Under 37 CFR 1.8(a)

I certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513.

Richard L. Moseley

Date 8/15/03