

TTAB

B1200/40001  
Customer No. 03000

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

D & M NEW WORLD MANAGEMENT,  
INC.,

Opposer,

Opposition No. ~~91162831~~ 187

91162831

76/521,791

TORGOVY DOM "AROMA"  
TRADE HOUSE "AROMA",

Applicant.

APPLICANT'S ANSWER

Applicant, TORGOVY DOM "AROMA" for its Answers to the Notice of Opposition, states as follows, in accordance with the correspondingly numbered paragraphs of the Notice of Opposition:

1. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 1, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

2. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 2, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

3. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 3, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

4. Applicant is without sufficient knowledge and information to form a belief as



12-20-2004

to the truth of the statements set forth in paragraph 4, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

5. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 5, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

6. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 6, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

7. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 7, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

8. Admitted.

9. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 9, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

10. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 10, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

11. Denied.

12. Not applicable. This is a statement of law and no answer is required.

13. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 13, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

14. Applicant is without sufficient knowledge and information to form a belief as to the truth of the statements set forth in paragraph 14, and Applicant therefore denies the same and demands strict proof thereof at the final hearing.

15. Admitted.

16. Denied.

17. Denied.

The International Trademark Registration No. 784523 for the mark "ЧЕРНЫЙ АИСТ" which is translated from Russian into English as "black stork", does not include the U.S. among designated countries.

18. Denied

19. Denied.

**WHEREFORE**, Applicant prays that the Opposition be dismissed.

CAESAR, RIVISE, BERNSTEIN,  
COHEN & POKOTILOW, LTD.

December 16, 2004

By Marina E. Volin

Marina E. Volin  
11th Floor - 7 Penn Center  
1635 Market Street  
Philadelphia, PA 19103-2212  
(215) 567-2010  
Attorneys for Applicant

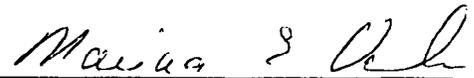
#### CERTIFICATE OF SERVICE

I hereby certify that one (1) true and correct copy of the foregoing **APPLICANT'S ANSWER** in Opposition No. 911 62832 has been served upon the Opposer by mailing the same, via First Class Mail, postage prepaid, in an envelope addressed to: Gail E. Nickols, Esq.; GRAHAM CAMPAIGN; 36 West 44<sup>th</sup> Street, New York, NY 10036, on this December 16, 2004.

Marina E. Volin  
Marina E. Volin

**CERTIFICATE OF MAILING**

I hereby certify that the foregoing **APPLICANT'S ANSWER**, in Opposition No. 911 62832 is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to: Commissioner for Trademarks, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, VA 22313-1451 on this December 16, 2004.



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Marina E Volin

**Pope, Angela**

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**From:** Duhart, Celestine

**Sent:** Tuesday, March 08, 2005 2:31 PM

**To:** Pope, Angela

Hi Angie, Please release this application so that the prosecution can continue. **Thanks**  
**76/157,925**