

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

In re Application No. 85071058 for the mark MAMANA published on April 19, 2011.

Amana Society, Inc.,)	
)	
Opposer,)	85/071,058
)	Opposition No. 91200318
v.)	
)	ANSWER OF APPLICANT SHIRAZ
Shiraz Foods, Inc.,)	FOODS, INC.
)	
Applicant.)	

Shiraz Foods, Inc. ("Applicant") responds to Opposer's Notice of Opposition as follows:

1. Applicant lacks knowledge or information sufficient to form a belief as to the allegations in the "Grounds for Opposition" of the Notice of Opposition and therefore denies these allegations both specifically and generally.
2. Applicant lacks knowledge or information sufficient to form a belief as to the allegations in the Notice of Opposition and therefore denies all allegations.
3. Applicant denies any type of violation of Trademark Act Section 2(d).
4. Applicant denies that there is any type of "dilution" under Trademark Act Section 43(c).

AFFIRMATIVE DEFENSES

As further and affirmative defenses, Applicant alleges as follows:

- A. Opposer's claim is barred in whole or in part by the doctrine of laches.
- B. Opposer's claim is barred in whole or in part by the doctrine of acquiescence.
- C. Opposer's claim is barred in whole or in part because the opposition fails to state a



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claim upon which relief can be granted, and in particular, fails to state legally sufficient grounds for sustaining the opposition.

D. Applicant reserves the right to additional defenses as investigation and discovery continue.

Wherefore, applicant prays for the following relief:

1. The Notice of Opposition be dismissed with prejudice.
2. That the Board grant any other relief that may be just or equitable.

Dated: July 18, 2011

By



Bahram Monfared on behalf of Shiraz Foods, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above Answer was mailed via U.S. mail this 19 day of July, 2011 to: James C. Nemmers, Shuttleworth & Ingersoll, LPLC, 115 3rd St. SE, Ste. 500, Cedar Rapids, IA 52401, United States.

By

A handwritten signature in black ink, appearing to read 'Bahram Monfared', written in a cursive style.

Bahram Monfared on behalf of Shiraz Foods, Inc.