

ESTTA Tracking number: **ESTTA593093**

Filing date: **03/18/2014**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	Juvenis Corp.		
Entity	Corporation	Citizenship	New York
Address	155 East 55th Street. Suite 206 New York, NY 10022 UNITED STATES		

Correspondence information	Doaa Ayoubi President Juvenis Corp. 155 East 55th Street. Suite 206 New York, NY 10022 UNITED STATES darehim@hotmail.com Phone:9175366054
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**Applicant Information**

Application No	86010816	Publication date	03/18/2014
Opposition Filing Date	03/18/2014	Opposition Period Ends	04/17/2014
Applicant	Erom Inc. 14630 Industry Circ. La Mirada, CA 90638 CANADA		

**Goods/Services Affected by Opposition**

Class 011. First Use: 2013/07/15 First Use In Commerce: 2013/07/15 Opposed goods and services in the class: Water ionizers; Water purification and filtration apparatus; Water purification installations; Water purification tanks; Water purification units
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**Grounds for Opposition**

Deceptiveness	Trademark Act section 2(a)
False suggestion of a connection	Trademark Act section 2(a)
Priority and likelihood of confusion	Trademark Act section 2(d)
The mark is deceptively misdescriptive	Trademark Act section 2(e)(1)
Other	1. Juvenis Corporation is a registered company in the state of new york and the only incorporated business with the name (JUVENIS). Attached please find certificate of incorp. And first position in google search for (Juvenis Cosmetics) which we majorly use for online reviews and sales through our online store. 2. Registering another identical name will

	<p>negatively impact our well branded online sales by creating too many search results with identical name and customers confusion. 3. Company is filing for classes Water ionizers; Water purification, water purification units, water purification units, which may create confusion with some of our skincare products in internet search like our water tonic, and toners, our facial water steamers, and portable pedicure spa water units. Our well established internet sales through our website above will be negatively impacted by registering to another company with identical name, due to the fact that it will conflict with internet search Engines, showing same company name and similar product name as well. 4. We are spreading our locations now to many states in the USA, with California being the new addition in March 2014 and that is the business location for the above company, in which I am opposing due to the major negative impact it will create with local directories having identical names (Juvenis) in the same state with products that can be confusing to my prospect customers and not clearly identified. 5. Juvenis Corporation has been doing business under the Juvenis name for (DBA) since 2004 before it was incorporated later on. And have done business all across the USA and the long Juvenis has been long associated with skincare products and cosmetics, and my trading will be impacting by registering another identical name. 6. My Trade Mark (Juvenis) will be will be severely impacted by registering brand to another company by the possibility of having it falsely associated with our products, in which may add more liability to our company, and make the public make certain assumptions that it is associated with us, since we also sell products like facial water steamers and water toners.</p>
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### Marks Cited by Opposer as Basis for Opposition

U.S. Application No.	86145133	Application Date	12/16/2013
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	JUVENIS		

Design Mark	<h1>JUVENIS</h1>
Description of Mark	NONE
Goods/Services	Class 003. First use: First Use: 2004/01/15 First Use In Commerce: 2004/03/15 Non-medicated skin care preparations, namely, creams, lotions, gels, facial toners, skin cleansers, facial scrubs, antiaging creams, skin and scalp conditioning lotions

U.S. Application No.	86137878	Application Date	12/08/2013
Registration Date	NONE	Foreign Priority Date	NONE

Word Mark	JUVENIS. NATURAL AND SCIENCE MADE SIMPLE
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Design Mark	 <p><i>Nature and Science Made Simple</i></p>
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Description of Mark	The mark consists of the wording JUVENIS in white in stylized font in a black color rectangular with thin gold strip that meet with a black oval that has a thin gold frame with a white and gold lotusflower in i and the wording Nature and Science Made Simple underneath it in black font and white background.
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Goods/Services	Class 003. First use: First Use: 2004/01/15 First Use In Commerce: 2004/03/15 Non-medicated skin care preparations, namely, creams, lotions, gels, skin cleansers, facial scrubs
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Related Proceedings	Registering trade mark applications numbers are 86145133, and 86137878 for the trade mark Juvenis
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Attachments	86145133#TMSN.jpeg( bytes ) 86137878#TMSN.jpeg( bytes ) Scan0023.pdf(600491 bytes )
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### Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Doaa Ayoubi/
Name	Doaa Ayoubi

Date	03/18/2014
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of trademark application Serial No. 86010816

For the mark...: JUVENIS

Published in the Official Gazette on

03/17/2014

JUVENIS CORPORATION

Juvenis Coporation

155 East 55<sup>th</sup> Street. Suite 206

New York, NY 10022

vs.

Erom Inc

14630 Industry Circ.

La Miranda, CA 90638

NOTICE OF OPPOSITION Dated 03/18/2014

Juvenis Corporation

155 East 55<sup>th</sup> Street. Suite 206

New York, NY 10022

The above-identified opposer believes that it/he/she will be damaged by registration of the mark shown in the above-identified application, and hereby opposes the same.(2)

The grounds for opposition are as follows:

- 1. Juvenis Corporation is a registered company in the state of new york and the only incorporated business with the name (JUVENIS). Attached please find certificate of incorp. And first position in google search for (Juvenis Cosmetics) which we majorly use for online reviews and sales through our online store.*
- 2. Registering another identical name will negatively impact our well branded online sales by creating too many search results with identical name and customers confusion.*
- 3. Company is filing for classes Water ionizers; Water purification, water purification units, water purification units, which may create confusion with some of our skincare products in internet search like our water tonic, and toners, our facial water steamers, and portable pedicure spa water units. Our well established internet sales through our website above will be negatively impacted by registering to another company with identical name, due to the fact that it will confict with internet search Engines, showing same company name and similar product name as well.*
- 4. We are spreading our locations now to many states in the USA, with California being the new addition in March 2014 and that is the business location for the above company, in which I am opposing due to the major negative impact it will create with*

*local directories having identical names (Juvenis) in the same state with products that can be confusing to my prospect customers and not clearly identified.*

5. *Juvenis Corporation has been doing business under the Juvenis name for (DBA) since 2004 before it was incorporated later on. And have done business all across the USA and the long Juvenis has been long associated with skincare products and cosmetics, and my trading will be impacting by registering another identical name.*
  
6. *My Trade Mark (Juvenis) will be will be severely impacted by registering brand to another company by the possibility of having it falsely associated with our products, in which may add more liability to our company, and make the public make certain assumptions that it is associated with us, since we also sell products like facial water steamers and water toners.*

By *Doaa Ayoubi*

Signature:



Date 03/18/2014

(President and CEO of Juvenis Corporation)  
OMB No. 0651-0040 (Exp. 5/31/04)