

1. In Answering paragraph 1 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

2. In Answering paragraph 2 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

3. In Answering paragraph 3 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

4. In Answering paragraph 4 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

5. In Answering paragraph 5 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

6. In Answering paragraph 6 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies such allegations.

7. In Answering paragraph 7 of the Notice of Opposition, Applicant does admit in part and does deny in part the allegations set forth therein. Applicant admits that they intend to apply the published mark, **B-MUNE**, to nutraceuticals for boosting the immune system, dietary

supplement, pharmaceutical preparations for treating and preventing infectious diseases, cancer, allergies and autoimmune diseases.

As to the allegations of being identical and/or highly similar to the goods on which Opposer has used its mark BIMUNO & Design in U.S. commerce and the goods identified in Class 5 in Opposer's Reg. No. 3,376,147, Applicant lacks sufficient knowledge or information to form a belief as to those allegations and accordingly denies such allegations.

Applicant denies the remaining allegations as set forth in ¶7.

8. Answering paragraph 8 of the Notice of Opposition, Applicant hereby denies the allegations as set forth therein.

9. In Answering paragraph 9 of the Notice of Opposition, Applicant hereby denies the allegations as set forth therein.

AFFIRMATIVE DEFENSES

Applicant asserts that the following affirmative defenses bar Opposers' requested relief in its Notice of Opposition.

FIRST AFFIRMATIVE DEFENSE

One or more of Opposers' claims fail to state a claim upon which relief may be granted. Applicant is filing a Motion to Dismiss concurrently with this Answer.

SECOND AFFIRMATIVE DEFENSE

One or more of Opposers' claims are barred by the equitable defenses of laches, acquiescence, waiver, estoppel and/or fraud.

THIRD AFFIRMATIVE DEFENSE

Applicant hereby gives notice that it may rely on any other defenses that may become available or appear proper during discovery, and hereby reserves its right to amend this Answer to assert any such defenses.

WHEREFORE, Applicant requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition and grant all other appropriate relief to Applicant as it deems just.

DATED: May 8, 2015

By:

 Shore Padrahi CEO

EPITO GENESIS, INC.

ATL Building Room 101

Storrs, CT 06268

Attn: Michael Vajdy

Shore Padrahi

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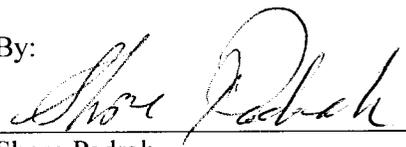
Facsimile: (860) 477-0775

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Opposition was served on Opposer's counsel via first class mail, postage prepaid, in an envelope addressed to Opposer's counsel as follows:

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DATED: May 8, 2015

By: 
Shore Padrah

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