

ESTTA Tracking number: **ESTTA748954**

Filing date: **05/27/2016**

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	Essilor International (Compagnie Generale d'Optique)
Granted to Date of previous extension	05/29/2016
Address	147 rue de Paris Charenton Le Pont Paris, 94220 FRANCE

Attorney information	Kay Lyn Schwartz Gardere Wynne Sewell LLP 1601 Elm Street, Suite 3000 Dallas, TX 75201 UNITED STATES ip@gardere.com, kschwartz@gardere.com, jfulmer@gardere.com Phone:2149994702
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**Applicant Information**

Application No	86695935	Publication date	12/01/2015
Opposition Filing Date	05/27/2016	Opposition Period Ends	05/29/2016
Applicant	Cause Marketing Group, Inc. 1775 Rockies Court Lafayette, CO 80026 UNITED STATES		

**Goods/Services Affected by Opposition**

Class 009. First Use: 2015/02/01 First Use In Commerce: 2015/03/01 All goods and services in the class are opposed, namely: Eyewear, namely, sunglasses, eyeglasses- and ophthalmic frames and cases therefor
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**Grounds for Opposition**

Priority and likelihood of confusion	Trademark Act Section 2(d)
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**Mark Cited by Opposer as Basis for Opposition**

U.S. Registration No.	649296	Application Date	10/03/1956
Registration Date	07/30/1957	Foreign Priority Date	NONE
Word Mark	ORMA		
Design Mark			

Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 1956/04/00 First Use In Commerce: 1956/04/00 OPHTHALMIC LENSES MADE OF ORGANIC MATERIAL

Attachments	Essilor - Notice of Opposition ORAMA.pdf(572037 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	/Kay Lyn Schwartz/
Name	Kay Lyn Schwartz
Date	05/27/2016



3. Essilor is the owner of, and will rely upon herein, its common law rights and usage of the ORMA Mark throughout the United States.

4. In addition, Essilor is the owner of, and will rely upon herein, the following federally registered trademark:

Trademark	App. No. (App. Date)	Reg. No. (Reg. Date)	Goods
ORMA	72016897 (Oct-03-1956)	0649296 (July-30-1957)	Ophthalmic lenses made of organic material

5. The mark sought to be registered by Applicant in Application Serial No. 86/695,935 is confusingly similar to Essilor's ORMA Mark, as to be likely, when associated with the goods of Applicant, to cause confusion, to cause mistake or to deceive, thereby to Essilor's damage.

**WHEREFORE**, Essilor prays that Applicant be required to answer this Notice of Opposition; that the mark made the subject of U.S. Application Serial No. 86/695,935 be refused registration; and that Opposer be awarded such other and further relief as may be deemed to be just and proper.

Respectfully submitted,

Date: May 27, 2016

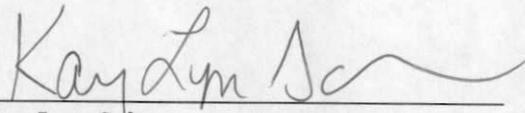


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ATTORNEYS FOR OPPOSER

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing *Notice of Opposition* was served in accordance with 37 C.F.R. 2.101 upon Applicant at the correspondence address of record as indicated below on May 27, 2016:

Thomas A. Zeigler  
AlvaradoSmith  
1 MacArthur Place, Suite 200  
Santa Ana, CA 92707-5941  
ATTORNEYS FOR APPLICANT  
CAUSE MARKETING GROUP, INC.

  
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Kay Lyn Schwartz