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U.S. Patent & TMO/TM Mail Rcpt Dt. #22

TTAB

I hereby certify that on the date specified below, this correspondence is being deposited with the United States Postal Service as first-class mail in an envelope addressed to: Trademark Trial and Appeal Board, Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3514.

Dec. 31, 2003
Date

Annette Baca
Annette Baca

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

PFIZER, INC.,)	
)	Opposition No. 91/158,526
Opposer,)	
)	Serial No. 78/188,192
v.)	
)	
FLORA TECHNOLOGY CORP.,)	
)	
Applicant.)	Attorney Docket No. 340082.801
_____)	

Trademark Trial and Appeal Board
Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3514

ANSWER TO NOTICE OF OPPOSITION

Applicant Flora Technology Corp. ("Applicant"), by and through its attorneys, hereby answers the Notice of Opposition filed by Pfizer, Inc. ("Opposer"), as follows:

- Applicant lacks sufficient information to enable it to form a belief as to the truth of the allegations of Paragraph 1 of the Notice of Opposition, and on that basis denies them.

2. Applicant lacks sufficient information to enable it to form a belief as to the truth of the allegations of Paragraph 2 of the Notice of Opposition, and on that basis denies them.

3. Applicant lacks sufficient information to enable it to form a belief as to the truth of the allegations of Paragraph 3 of the Notice of Opposition, and on that basis denies them.

4. Applicant admits that what appears to be a copy of U.S. Trademark Registration No. 1,963,626 is attached to the Notice of Opposition. Applicant lacks sufficient information to enable it to form a belief as to the truth of the remaining allegations of Paragraph 4 of the Notice of Opposition, and on that basis denies them.

5. Applicant lacks sufficient information to enable it to form a belief as to the truth of the allegations of Paragraph 5 of the Notice of Opposition, and on that basis denies them.

6. Applicant admits the allegations of Paragraph 6 of the Notice of Opposition.

7. Applicant admits the allegations of Paragraph 7 of the Notice of Opposition.

8. Applicant admits that Applicant's filing date is November 22, 2002. Applicant denies lacks sufficient information to enable it to form a belief as to the truth of the remaining allegations of Paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations of Paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations of Paragraph 10 of the Notice of Opposition.

11. Applicant denies the allegations of Paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations of Paragraph 12 of the Notice of Opposition.

13. Applicant admits that the registration of Applicant's mark would give Applicant a *prima facie* exclusive right to use the mark for the goods described in Applicant's application. Applicant denies the remaining allegations of Paragraph 13 of the Notice.

14. Applicant denies the allegations of Paragraph 14 of the Notice of Opposition.

AFFIRMATIVE DEFENSE

1. There is no likelihood of confusion between Applicant's mark as used in connection with Applicant's goods and Opposer's marks as used in connection with Opposer's goods.

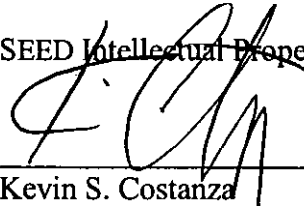
PRAYER FOR RELIEF

WHEREFORE, Applicant requests judgment dismissing Opposer's Notice of Opposition and this proceeding in its entirety.

DATED this 31st day of December, 2003.

Respectfully submitted,

SEED Intellectual Property Law Group PLLC




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Attorneys for Applicant
FLORA TECHNOLOGY CORP.

CERTIFICATE OF SERVICE

I, Annette Baca, hereby certify that the above ANSWER TO NOTICE OF OPPOSITION was served on Opposer by depositing same with the U.S. Postal Service, first-class postage prepaid, on December 31, 2003, addressed as follows:

Nels T. Lippert, Esq.
Jennifer A. Gaeta, Esq.
HALE AND DORR LLP
300 Park Avenue
New York, New York 10022



Annette Baca