

ESTTA Tracking number: **ESTTA555132**

Filing date: **08/20/2013**

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

Proceeding	91211534
Party	Defendant Mineral Resources International, Inc.
Correspondence Address	MINERAL RESOURCES INTERNATIONAL, INC. MINERAL RESOURCES INTERNATIONAL, INC. 1990 W 3300 S OGDEN, UT 84401-9774 susana@mineralresourcesint.com
Submission	Answer
Filer's Name	Courtney Cooper
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Date	08/20/2013
Attachments	Answer to Notice of Opposition_No.91211534.pdf(82963 bytes)

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

<p>NORWEX HOLDING AS, NORWEX MALTA LIMITED, NORWEX CANADA, INC. AND NORWEX USA INC., Opposers, vs. MINERAL RESOURCES INTERNATIONAL INC., Applicant.</p>	<p>OPPOSITION NO. 91211534 Serial No.: 85/785,152 Mark:</p>
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ANSWER TO NOTICE OF OPPOSITION

The following is the Answer of Applicant Mineral Resources International, Inc. (“Applicant”), owner of the Federal Trademark Application Serial No. 85/785,152 for the mark represented in that application (hereinafter “Applicant’s Mark”), by and through Counsel, Courtney Cooper Law, LLC, to the Notice of Opposition filed on July 12, 2013 by Norwex Holding as, Norwex Malta Limited, Norwex Canada, Inc., and Norwex USA Inc., (hereinafter “Norwex” or “Opposer”), and assigned Opposition No. 91211534.

1. Admitted.
2. Admitted.
3. Admitted.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph 4 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph 5 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
6. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph 6 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
7. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph 7 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.
8. Denied, as Applicant is without knowledge or information sufficient to form a belief as to whether Opposer's marks are valid and subsisting and whether Opposer is the current correct and proper owner of the claimed registrations.
9. Denied, as Applicant is without knowledge or information sufficient to form a belief as to Opposer's alleged first use and/or continued use of the marks in question.
10. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph 10 of the Notice of Opposition. Since Applicant can neither admit or deny the paragraph as written, Applicant must deny.
11. Denied, as Applicant is without knowledge or information sufficient to form a belief as to Opposer's date of first use of the mark; whether Opposer is the current correct and proper owner of the claimed registrations; and whether each registration is

currently valid and subsisting; and therefore, Applicant is without knowledge and information sufficient to form a belief as to priority as put forth in paragraph 11 of the Notice of Opposition.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

FURTHERMORE, Applicant sets forth the following in support of its position;

21. Applicant's mark is unique and distinctive.

22. Applicant's mark and Opposer's mark are different in appearance.

23. Applicant's mark and Opposer's mark are create different commercial impressions due to context.

24. Opposer's mark is black and white, while Applicant's mark is blue and light blue with a white or clear background.

25. Opposer's mark contains a small water drop to the left and above concentric circles.

Applicant's mark features a large water drop that is dark blue and open at the top and sits in the middle of light blue water ripples around the drop.

26. Water drops and/or rain drops with ripples/concentric circles are registered in other trademarks and services not owned by Opposer.
27. Rain drops and/or water drops are registered in numerous other trademarks by third parties for health related or natural goods and services, as well as cleaning products, not owned by Opposer.
28. Rain drops and/or water drops are a common representation of natural products.
29. Applicant's products and Opposer's products are not marketed through the same channels of trade.
30. Opposer does not provide a product similar to Applicant's product for the designated trademark.
31. Applicant's mark and Opposer's mark are not likely to cause confusion, mistake or deception to purchasers as to the source of Opposer's goods or services.
32. Applicant's mark and Opposer's mark are not identical, nor are the marks so similar that there is the potential of dilution of Opposer's mark.
33. Applicant's mark and Opposer's mark are not likely to disparage or falsely suggest a trade connection between Opposer and Applicant.

WHEREFORE, Applicant prays that the Trademark Trial and Appeal Board deny the Opposition and permit registration of Applicant's proposed mark in Application Serial Number 85/785,152 in the United States Patent and Trademark Office. Please direct all correspondence and communications to:

Courtney Cooper
Courtney Cooper Law, LLC
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TEL: (801)927-7729
EMAIL: courtneycooperlaw@gmail.com

Applicant hereby appoints Courtney Cooper, a member of the bars of the State of New York and the State of Utah, as its attorney with the full power to represent the Applicant in this proceeding.

DATED this 20th day of August, 2013.

Respectfully submitted,

/s/ Courtney Cooper

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of ANSWER TO NOTICE OF OPPOSITION has been served on the following by delivering said copy on August 20, 2013, via First Class Mail, postage prepaid, to counsel for Opposer at the following address:

Bryan Haynes
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By: /s/ Courtney Cooper