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

Proceeding	91212758
Party	Defendant PHARMA-NATURAL INC.
Correspondence Address	ALBERT BORDAS, ESQ. ALBERT BORDAS, P.A. 5975 SUNSET DR STE 607 MIAMI, FL 33143-5174 tm@bordasiplaw.com
Submission	Answer
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Date	11/12/2013
Attachments	131112.Answer.Opposition Cardispan v. CJ Labs.pdf(70400 bytes)

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

C.J. Labs, Inc.)	
)	
)	
Opposer,)	
)	Opposition No. 91212758
)	Serial No. 85845980
vs.)	
)	
PHARMA-NATURAL INC.)	
)	
Applicant.)	
_____)	

Applicant’s PHARMA-NATURAL INC. Answer

Applicant, PHARMA-NATURAL INC. (“Applicant”), by and through its undersigned counsel, hereby files its Answer to Opposer’s, C.J. Labs, Inc.’s Opposition and states the following:

(Any allegation of Opposer’s Opposition not specifically admitted herein is hereby denied).

1. Admitted
2. Admitted
3. Admitted
4. Denied
5. Denied
6. Denied
7. Denied
8. Denied
9. Denied

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Opposer is not entitled to the relief requested in its Complaint because Opposer is not the owner of the mark at issue.

SECOND AFFIRMATIVE DEFENSE

The Opposer is not entitled to the relief requested in its Complaint because it does not have standing.

THIRD AFFIRMATIVE DEFENSE

Opposer fails to state a claim upon which relief can be granted.

FOURTH AFFIRMATIVE DEFENSE

Opposer has no priority in the disputed marks.

WHEREFORE, Applicant, PHARMA-NATURAL INC. respectfully requests that this Notice of Opposition be dismissed, with judgment entered in its favor and against Opposer C.J. Labs, Inc. and that this Honorable Court award all other relief to Applicant which it deems fair and reasonable under the circumstances of this case.

Respectfully submitted,

Albert Bordas, P.A.
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By: /Albert Bordas/
Albert Bordas, Esq.
FL Bar No: 330220

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Applicant's Answer was served via Facsimile and U.S. Mail this 21th day of November 2013 to the following person(s):

Amaury Cruz
Amaury Cruz, P.A.
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By: /Albert Bordas/
Albert Bordas, Esq.

CERTIFICATE OF ONLINE SUBMISSION

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed online with the Trademark Trial and Appeal Board using ESTTA, this 12th day of November 2013.

By: /Albert Bordas/
Albert Bordas, Esq.