

ESTTA Tracking number: **ESTTA723929**

Filing date: **02/01/2016**

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

Proceeding	91225575
Party	Defendant Vapir, Inc.
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Date	02/01/2016
Attachments	vapiranswer91225575.pdf(81514 bytes)

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

In the Matter of
Application Serial Number 86592058

JJA Distributors, LLC

Opposer,

v.

Opposition No. 91225575

Vapir, Inc.

Applicant.

UNITED STATES PATENT AND
TRADEMARK TRIAL AND APPEAL BOARD
PO BOX 1451
ALEXANDRIA VA 22313-1451

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Vapir, Inc. ("Applicant"), for its answer to the Notice of Opposition filed by JJA Distributors, LLC against application for registration of Applicant's trademark PRIMA, Serial Number 86592058, pleads and alleges as follows:

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 1 and on that basis denies same.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 2 and on that basis denies same.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 3 and on that basis denies same.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 4 and on that basis denies same.
5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 5 and on that basis denies same.
6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 6 and on that basis denies same.
7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 7 and on that basis denies same.
8. Applicant admits the allegations stated in paragraph 8.
9. Applicant admits the allegations stated in paragraph 9.
10. Applicant admits the allegations stated in paragraph 10.
11. Applicant admits the allegations stated in paragraph 11.
12. Applicant admits the allegations stated in paragraph 12.
13. Applicant repeats the Response in Paragraphs 1-12 above.
14. Applicant denies the allegations stated in paragraph 14.
15. Applicant denies the allegations stated in paragraph 15.
16. Applicant denies the allegations stated in paragraph 16.
17. Applicant denies the allegations stated in paragraph 17.
18. Applicant denies the allegations stated in paragraph 18.

19. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 19 and on that basis denies same.
20. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 20 and on that basis denies same.
21. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 21 and on that basis denies same.
22. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 22 and on that basis denies same.
23. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 23 and on that basis denies same.
24. Applicant denies the allegations stated in paragraph 24.
25. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 25 and on that basis denies same.
26. Applicant denies the allegations stated in paragraph 26.
27. Applicant denies the allegations stated in paragraph 27.

Affirmative Defenses

28. Petitioner's claims for relief are barred by unclean hands.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed in its entirety, and that a registration issue to Applicant for its mark.

Respectfully Submitted,

/jmf/

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CERTIFICATE OF FILING

I hereby certify that this answer is being electronically filed with the United States Patent and Trademark Trial and Appeal Board on the 1st day of February, 2016.

/jmf/
Jeffrey M. Furr, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this paper is being deposited on the 1st day of February, 2016 with the United States Postal Service in an enveloped addressed to:

Matthew R. Schantz
Frost Brown Todd LLC
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/jmf/
Jeffrey M. Furr, Esquire