

ESTTA Tracking number: **ESTTA1023600**

Filing date: **12/18/2019**

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

Proceeding	91252252
Party	Defendant TANGI-PAC, L.L.C.
Correspondence Address	MACKENZIE D. RODRÁ#GUEZ GARVEY, SMITH & NEHRBASS, PATENT ATTORNE 3838 N. CAUSEWAY BLVD. THREE LAKEWAY CENTER, SUITE 3290 METAIRIE, LA 70002 mrodriguez@patents.gs, Mackenzierodriguez@patents.gs, SFord@patents.gs, SNehrbass@gmail.com no phone number provided
Submission	Answer
Filer's Name	Mackenzie D. Rodriguez
Filer's email	MackenzieRodriguez@patents.gs
Signature	/Mackenzie D. Rodriguez, LA Bar #32428/
Date	12/18/2019
Attachments	ApplicantAnswer20191218.pdf(102039 bytes )

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

In the matter of  
Trademark Application Serial No. 88/339,754  
Filed 14 March 2019

UNITED INDUSTRIES CORPORATION,	*	
Opposer	*	Opposition No. 91252252
	*	
v.	*	<b>ANSWER</b>
	*	
TANGI-PAC, L.L.C.	*	
Applicant	*	

**ANSWER**

Applicant, Tangi-Pac, L.L.C. (“Applicant” or “Tangi-Pac”), through its undersigned counsel, responds to United Industries Corporation’s (“Opposer”) Notice of Opposition as follows:

1. Applicant denies this allegation for lack of sufficient information to justify a belief.
2. Applicant denies this allegation as there is not a family of STOP formative marks.
3. Applicant denies this allegation as there is not a family of STOP formative marks.
4. Applicant denies this allegation as there is not a family of STOP formative marks, and denies ownership of the registrations as alleged for lack of sufficient information to justify a belief.
5. Applicant admits this allegation.
6. Applicant admits this allegation.
7. Applicant admits that the filing date of the subject application is later than the filing dates of Registration Nos. 2,270,338; 2,148,032; and 1,197,097 cited by Opposer.
8. Applicant can neither admit nor deny this allegation.
9. Applicant denies this allegation.

10. Applicant admits that the goods identified in the subject application are related to the goods identified in Opposer's Registration No. 2,148,032. Applicant denies that the goods identified in the subject application are related to the goods identified in Opposer's Registration Nos. 2,270,338 and 1,196,097.

11. Applicant denies this allegation.

12. Applicant denies this allegation.

13. Applicant denies this allegation.

Respectfully submitted,

/Mackenzie D. Rodríguez, La Bar No. 32428/

Mackenzie D. Rodríguez, LA Bar No. 32,428

e-mail: [MackenzieRodriguez@patents.gs](mailto:MackenzieRodriguez@patents.gs)

Charles C. Garvey, Jr., LA Bar No. 5,954

Gregory C. Smith, LA Bar No. 12,174

Seth M. Nehrbass, LA Bar No. 20,309

Vanessa M. D'Souza, LA Bar No. 31,708

Julia M. FitzPatrick, LA Bar No. 34,178

Julie R. Chauvin, LA Bar No. 34,265

Fabian M. Nehrbass, LA Bar No. 35,264

Garvey, Smith & Nehrbass, Patent Attorneys, L.L.C.

PTO Customer No. 22920

3838 N. Causeway Blvd., Suite 3290

Metairie, LA 70002

Tel.: (504) 835-2000

Fax: 504-835-2070

[www.neworleanspatents.com](http://www.neworleanspatents.com)

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served on Attorneys for Opposer, LEYDIG, VOIT & MAYER, LTD. by forwarding said copy on December 18, 2019, via e-mail to:

Michelle L. Zimmermann  
Anne E.Naffziger  
Stella M. Brown  
LEYDIG, VOIT & MAYER, LTD.  
[MZimmermann@leydig.com](mailto:MZimmermann@leydig.com)  
[ANaffziger@leydig.com](mailto:ANaffziger@leydig.com)  
[SBrown@leydig.com](mailto:SBrown@leydig.com)

Signature: /Mackenzie D. Rodríguez, La. Bar No. 32428/ Date: December 18, 2019  
Mackenzie D. Rodríguez