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

Proceeding	91253372
Party	Plaintiff NUORI ApS
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Submission	Answer to Counterclaim
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Date	04/06/2020
Attachments	2020-04-6 Answer.pdf(26770 bytes )

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

NUORI ApS,

**Opposer**

v.

**Opposition No. 91253372**

Nouri Life LLC,

**Applicant**

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Re U.S. Trademark Application Serial No. 88327452

For: NOURI

**ANSWER AND AFFIRMATIVE DEFENSES TO COUNTERCLAIM  
TO CANCEL OPPOSER'S MARK**

Opposer, NUORI ApS answers and responds to the Counterclaim of Nouri Life LLC as follows:

1. Opposer lacks knowledge or information sufficient to form a belief regarding the allegations of this paragraph and on that basis denies it.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

Opposer further denies that Applicant is entitled to the relief requested.

**OPPOSER'S AFFIRMATIVE DEFENSES**

In order not to waive any affirmative defenses, and in order to preserve such defenses, Opposer, through counsel, pleads the following affirmative defenses:

A. Opposer affirmatively alleges that Applicant's Counterclaim fails to state a claim upon which relief can be granted.

B. Applicant's claims are barred, in whole or in part, by the equitable doctrine of laches.

C. Applicant's claims are barred, in whole or in part, by the equitable doctrine of acquiescence.

D. Applicant's claims are barred, in whole or in part, by the equitable doctrine of estoppel.

E. Applicant's claims are barred, in whole or in part, by the equitable doctrine of waiver.

F. Opposer reserves the right to assert other affirmative defenses as this action proceeds, and which may be revealed through discovery.

April 6, 2020

Respectfully submitted,

/Jeffrey M. Goehring/  
Jeffrey M. Goehring

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**CERTIFICATE OF SERVICE**

I, hereby certify that a true and complete copy of the foregoing ANSWER TO COUNTERCLAIM was served on counsel of record for Applicant by email at the addresses of record noted below:

MATTHEW D MATKOV  
MATKOV CLARK LLC  
543 PROSPECT AVENUE  
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Dated: April 5, 2020

/Jeffrey M. Goehring/  
Jeffrey M. Goehring