

ESTTA Tracking number: **ESTTA1124570**

Filing date: **04/02/2021**

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

Proceeding	91267248
Party	Plaintiff Dani Fox, Associates, LLC
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Submission	Motion to Dismiss - Rule 12(b)
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Signature	/Christopher DiSchino/
Date	04/02/2021
Attachments	MTD_MTS_Counterclaim_Final_04022021.pdf(1632749 bytes )

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

In the matter of Trademark Application:  
Serial No. 90049470  
Filed: July 13, 2020  
Trademark: DOCTOR’S DAUGHTERS  
Published: January 26, 2021

-----X	)	
	)	
<b>Dani Fox, Associates, LLC,</b>	)	
	)	
Opposer/Counterclaim Respondent	)	
v.	)	Opposition No.: 91267248
	)	
<b>Doctors Daughters LLC,</b>	)	
	)	
Applicant/Counterclaim Petitioner	)	
-----X	)	

**OPPOSER’S MOTION TO DISMISS OR STRIKE  
APPLICANT’S COUNTERCLAIM FOR CANCELLATION  
PURSUANT TO FRCP 12(b)(6) and 12(f)**

Opposer/Counterclaim Respondent, Dani Fox, Associates, LLC (“Opposer”) respectfully moves this Board to dismiss, or alternatively, to strike (either in its entirety or a portion thereof) the Counterclaim for Cancellation submitted by Applicant/Counterclaim Petitioner, Doctors Daughters LLC (“Applicant”), and in support hereof states as follows:

In its Counterclaim for Cancellation, Applicant has asserted that it has priority of use for its applied for mark “DOCTOR’S DAUGHTERS”, namely U.S. Serial No. 90049470 (“Pending Application”) over Opposer’s registered trademark “DOCTOR’S DAUGHTER”, namely U.S. Reg. No. 6092249 (“Registered Mark”). However, it is clear from allegations made in Applicant’s Counterclaim for Cancellation that Applicant’s alleged use does not constitute analogous use, and accordingly, Applicant has failed to state a claim for cancellation. The counterclaim should be dismissed pursuant to Fed. R. Civ. P. 12(b)(6).

In the alternative, if this Board denies Opposer's Motion to Dismiss contained herein, Opposer hereby moves the Board to strike Applicant's Counterclaim, either in its entirety or certain parts thereof, which allege use in commerce and analogous use, pursuant to TBMP § 506 and Fed. R. Civ. P. 12(f).

## **I. FACTUAL BACKGROUND**

Opposer first applied to register the Registered Mark on May 24, 2019, on a 1(b) [intent to use] basis, in connection with various cosmetic and skin care products. Opposer's application registered on June 30, 2020, after its Statement of Use was accepted, which established a date of first use in commerce at least as early as April 27, 2020.

Applicant, on the other hand, filed its application for the Pending Application on July 13, 2020, also on a 1(b) [intent to use] basis, in connection with certain "superfood" products, namely rolled oats and dairy-free ice cream. The Pending Application remains in its 1(b) [intent to use] status as of the date of this Motion, as Applicant has not filed a Statement of Use alleging use in commerce of the goods set forth therein. Applicant's Pending Application published for opposition on January 26, 2021, whereafter Opposer timely filed its Notice of Opposition. Applicant filed its Answer, Affirmative Defenses, and Counterclaim for Cancellation on March 8, 2021. This Board may take judicial notice of the status of Applicant's Pending Application, as set forth in the current printout from the electronic database records of the United States Patent and Trademark Office (TSDR), showing the current status and title (owner) of the Pending Application, attached hereto as **Exhibit E**. See TMEP § 714.12.

In support of Applicant's Counterclaim for Cancellation, Applicant alleges that it is the senior user of the mark based on a singular Instagram post, dated March 16, 2018. (Countercl. ¶¶ 6). The post displays a photograph of two (2) types of toast with different toppings, and a caption

that asks, “[w]hich toast toppings would you choose? Sometimes I can’t decide and go with both”. See **Exhibit A**. Notably, Applicant’s Instagram post does not contain any image or reference to Applicant’s superfood rolled oats or dairy-free ice cream, nor does it reference the sale of any other goods or services, with particular regard to those goods set forth in the Pending Application.

## **II. LEGAL STANDARDS**

### **A. Motion to Dismiss For Failure to State a Claim under Fed. R. Civ. P. 12(b)(6)**

As previously noted by the Board:

[t]o withstand a motion to dismiss for failure to state a claim upon which relief can be granted, a plaintiff [(or) counterclaim-plaintiff] need only allege sufficient factual content that, if proved, would allow the Board to conclude, or to draw a reasonable inference, that (1) the plaintiff has standing to maintain the proceeding, and (2) a valid ground exists for opposing or cancelling the registration. . . . Specifically, a complaint “must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’” [citations omitted]. In particular, the claimant must allege well-pleaded factual matter and more than “[t]hreadbare recitals of the elements of a cause of action, supported by mere conclusory statements.” [citations omitted]. Dragon Bleu (SARL) v. VENM, LLC, 112 USPQ2d 1925, 1926 (TTAB 2014).

### **B. Motion to Strike under Fed. R. Civ. P. 12(f)**

Pursuant to FRCP 12(f), “[t]he court may strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” The Board has further granted

requests to strike a counterclaim, or a portion thereof, where the respondent alleges that grounds set forth in the counterclaim are insufficient. *See Finanz St. Honore, B.V. v. Johnson & Johnson*, 85 USPQ2d 1478 (TTAB 2007); *Ohio State University v. Ohio University*, 51 USPQ2d 1289 (TTAB 1999); *Western Worldwide Enterprises Group Inc. v. Qingdao Brewery*, 17 USPQ2d 1137 (TTAB 1990).

### **III. ARGUMENT**

#### **A. Applicant's Counterclaim for Cancellation Fails to State a Claim**

Applicant has failed to state a claim under FRCP 12(b)(6) because it has not alleged “sufficient factual content that, if proved, ... draw[s] a reasonable inference that ... a valid ground exists for opposing or cancelling the registration.” *See Dragon Bleu* at 1926. The grounds for Applicant's Counterclaim for Cancellation is based on its allegation that it has priority through “analogous use” of the term “Doctor's Daughters” prior to Opposer's date of constructive first use, which Applicant acknowledges is May 24, 2019. In support thereof, Applicant submits a screenshot of an Instagram post, dated March 16, 2018, from its social media account handle, @doctorsdaughters. However, as further set forth below, this evidence is insufficient to establish the grounds for analogous use that Applicant relies on. Further, it paints an incomplete portrait of Applicant's actual use, as Applicant's only use of its mark is in the Instagram handle and Applicant did not begin any pre-sales activity, let alone actual sales activity, until nearly two (2) years later. In the past, the Federal Circuit Court has emphasized that the pieces of evidence must be viewed *as a whole*. Thus, the remaining allegations are nothing more than “threadbare recitals of the elements of a cause of action, supported by mere conclusory statements”, and therefore, Applicants' counterclaim for cancellation should be dismissed *Id.*

In order to prove that certain types of “pre-sales trade name activity” qualify as analogous

use, as Applicant contends, the Applicant must submit evidence supporting use analogous to trademark use showing that the promotional activities: (1) reached “more than a negligible share” of potential customers; and (2) were sufficient to have a “substantial impact on the purchasing public.” T.A.B. Systems v. PacTel Teletrac, 77 F.3d 1372, 37 U.S.P.Q.2d 1879, 1883 (Fed. Cir. 1995) (holding that the following uses did not constitute analogous use: use in press releases announcing the offering within a few months of a new vehicle location service; use in a slide show marketing presentation; trade show demonstrations using the term; and use in a marketing brochure distributed to prospective purchasers). Furthermore, analogous use must “create in the minds of the relevant public an association between the goods or services and their source.” Central Garden & Pet Co. v. Doskocil Manufacturing Co., Inc., 2013 WL 4635990, 108 U.S.P.Q.2d 1134, 1142 (T.T.A.B. 2013) (holding that evidence of creating “buzz” through use in a “name validation survey” [of 83 persons] and in a teaser ad [that did not mention any goods or services on or in connection with the mark at issue] is insufficient to constitute analogous use).

Regarding evidence of social media usage to establish analogous use, the Trademark Trial and Appeals Board has previously denied a similar claim that attempted to use, among other evidence, social media posts to establish analogous use. The PNC Financial Services Group, Inc., v. Ashe dba Spendology and Spendology LLC, Opp'n No. 91207409, Docket Entry #16, Pages 10-11 (T.T.A.B. 2013). In that case, the Board rejected the applicant’s evidence of analogous use, holding that (1) joining a social media platform (such as Twitter or Facebook) “does not by itself establish use analogous to trademark use”, (2) there was “no declaration testimony as to consumer exposure to applicant’s [social media], and (3) “[n]one of th[e] evidence shows use in connection with applicant’s identified services, and thus “fails to establish use analogous to trademark use”.  
Id.

In the present case, Applicant has provided *even less* evidence than the parties in PacTel, Central Garden, or Spendology to support its allegation of prior analogous use. The only factual support that it provides is one March 16, 2018 Instagram post which does not advertise any goods or services and was “liked” by 31 people. However, as in Spendology, reserving an Instagram handle alone is insufficient to establish analogous use and the post does not show use in connection with Applicant’s identified goods, which are superfood rolled oats; dairy-free ice cream; and dairy free-ice cream sandwiches. Id. Rather, the post shows two (2) types of toasts, and asks what toast toppings a viewer would choose. This is identical to one of the applicant’s twitter posts in Spendology, which asked “*Are you a smart spender?*”, without providing any reference to the applicant’s services, and thus failed to constitute analogous use. Id. Additionally, Applicant has not alleged the type and extent of advertising or marketing endeavors as in PacTel, and the Instagram post referenced by Applicant was liked by fewer people (here, 31 individuals) than those who took the survey in Central Garden (83 individuals) and further fails to show use in connection with the relevant goods and services, like with the teaser ad in Central Garden. Essentially, the Instagram post submitted by Applicant shows that it was reached by a negligible share of potential consumers and is nothing more than a personal social media account that did not provide any services or goods or make reference to any of Applicant’s own services or goods.

Moreover, even assuming, *arguendo*, that Applicant’s use of a social media handle constituted advertising material, which Opposer submits that it did not, TMEP § 904.04(b) clearly states that advertising material is generally not acceptable as a specimen for goods. Any material whose function is merely to tell the prospective purchaser about the goods, or to promote the sale of the goods, is unacceptable to support trademark use. *See In re MediaShare Corp.*, 43 USPQ2d 1304 (TTAB 1997); *In re Schiapparelli Searle*, 26 USPQ2d 1520 (TTAB 1993) ; *In re Drilco*

Indus. Inc., 15 USPQ2d 1671 (TTAB 1990); In re ITT Rayonier Inc., 208 USPQ 86 (TTAB 1980); In re Bright of Am., Inc., 205 USPQ 63 (TTAB 1979).

The following types of items are generally considered advertising, and unless they comprise point-of-sale material, are not acceptable as specimens of use on goods: advertising circulars and brochures; price lists; announcements; press releases; listings in trade directories; business cards; and online advertising banners appearing on search-engine results pages or in social media. Moreover, material used by the applicant to conduct its internal business is unacceptable as a specimen of use on goods. These materials include all documents whose sole function is to carry out the applicant's business dealings, such as invoices, bill heads, waybills, warranties, and business stationery. See In re Chicago Rawhide Mfg. Co., 455 F.2d 563, 173 USPQ 8 (C.C.P.A. 1972) ; In re Bright of Am., , 205 USPQ at 65; Upco Co. v. Speed Crete of La., Inc., 154 USPQ 555 (TTAB 1967); Dynacolor Corp. v. Beckman & Whitley, Inc., 134 USPQ 410 (TTAB 1962); Pendleton Woolen Mills v. Eloesser-Heynemann Co., 133 USPQ 211 (TTAB 1962); Varian Assocs. v. IMAC Corp., 160 USPQ 283 (N.D. Ill. 1968); Boss Co. v. Homemaker Rugs, Inc., 117 USPQ 255 (N.D. Ill. 1958). On the other hand, material that would otherwise be considered mere advertising *may* be acceptable as a specimen of use for goods if it includes a photograph of the applied-for mark appearing on the goods or on packaging for the goods. See TMEP §§904.02(b), 904.03, 904.03(b), 904.03(c). As is clearly set forth in Applicant's Counterclaim for Cancellation, Applicant does not use the designation "Doctor's Daughters" on any goods or product packaging.

Furthermore, upon a review of Applicant's alleged Instagram page, it is clear that Applicant did not start using the designation "Doctor's Daughters" to identify its own goods or services until 2020, at the earliest, well after Opposer's date of first use. This type of evidence

would be admitted since Applicant already has provided part of its Instagram page, and thus any other part of its Instagram page, or writings therein, in fairness, ought to be considered at the same time. *See* Fed. R. Evid. 106.

Posts on Applicant’s Instagram page indicate the following: (1) March 24, 2020 post - Applicant did not announce an intention to sell its own goods until the COVID-19 pandemic started; (2) July 9, 2020 post – Applicant’s first display of its own ice-cream sandwiches (still without any associated branding other than the Instagram handle) and announcement of first date selling at a farmer’s market of August 2, 2020; and (3) July 11, 2020 post - Applicant’s first mention of its overnight oats. *See* **Exhibit B**, **Exhibit C**, and **Exhibit D**, respectively. The July 9, 2020 post further shows that even once Applicant started selling its own goods, such sales were not interstate, as required to allege use in commerce, but rather were limited to intrastate commerce, namely the geographical area of La Jolle, a neighborhood in San Diego, California. *See* **Exhibit C**. Thus, Applicant’s Instagram actually shows that the earliest possible date of analogous use that Applicant could argue, i.e., when it first actually started “pre-sales activity” related to its own goods, is March 24, 2020, which is almost a year after Opposer’s date of first use for the Registered Mark, May 24, 2019.

In sum, the single Instagram post presented by Applicant, which (i) received a mere thirty-one (31) likes and (ii) does not use the mark in connection with any relevant goods or services, fails to show that the post reached “more than a negligible share” of potential customers or was sufficient to have a “substantial impact on the purchasing public”. *See* PacTel at 1883. Without this allegation, the remainder of Applicant’ counterclaim for cancellation contains mere conclusory statements and recitals of the elements of its cause of action. Thus, Applicant’ counterclaim fails to allege sufficient factual content that a valid ground exists for cancellation of

the Registered Mark, and should be dismissed for failure to state a claim under Fed. R. Civ. P. 12(b)(6).

**B. Applicant’s Counterclaim for Cancellation is Insufficient**

In the event that this Board finds that Applicant has adequately pled its counterclaim for cancellation, Opposer hereby contends, in the alternative, that the counterclaim, or the portions thereof alleging analogous use, should be stricken from the pleading, because they are grossly insufficient (or otherwise, immaterial or irrelevant) to prove analogous use sufficient to give Applicant, or the Pending Application, priority over Opposer, or the Registered Mark.

As more fully stated above, Applicant’s claim of prior analogous use hinges on the March 16, 2018 Instagram post it provided in its counterclaim. *See* **Exhibit A**. However, as set forth above, Applicant’s allegation does not meet the threshold required for analogous use, as it contains even less factual allegations than parties losing on their own analogous use claims in PacTel, Central Garden, and Spendology. Accordingly, in light of the fact that Applicant’s allegations of analogous use, specifically the March 16, 2018 Instagram post, are clearly insufficient, it should be stricken from the pleading. *See* Honore at 1478.

Additionally, if the allegations relating to analogous use are stricken from the pleading, then other allegations in the counterclaim should also be stricken as insufficient, immaterial and/or irrelevant. Specifically, Countercl. ¶¶ 4 and 5, which allege that Applicant is the senior user and first used its mark in commerce in March 2018, respectively, are merely conclusory statements without any factual support. *See* Great Adirondack Steak & Seafood Cafe, Inc. v. Adirondack Pub & Brewery, Inc., No. 91219162 (T.T.A.B. 2015) (striking “bald, conclusory allegations that are not supported by any facts”). The same applies, for instance, with ¶ 10, which states that Applicant has developed good will through its “longevity of usage in commerce, expenditure of in

promotional activities, and the impeccable quality and excellence of its products and services.” Once again, however, this is another merely conclusory statement without any facts to support it, for example, (i) how Applicant used the mark in commerce (as opposed to its alleged analogous use), (ii) the amount or nature of its promotional activities, or (iii) what makes its products and services of impeccable quality and excellence, mainly since at the time and for several months thereafter it had no products or services. Thus, the Board should strike from Applicant’s counterclaim for cancellation any allegation made regarding priority, analogous use, use in commerce, and/or goodwill as insufficient, immaterial and/or irrelevant.

#### **IV. CONCLUSION**

For the forgoing reasons, Opposer respectfully requests that the honorable Board grant its Motion to Dismiss, or alternatively, its Motion to Strike Applicant’s counterclaim for cancellation of the Registered Mark.

Date: April 2, 2021

Respectfully submitted,

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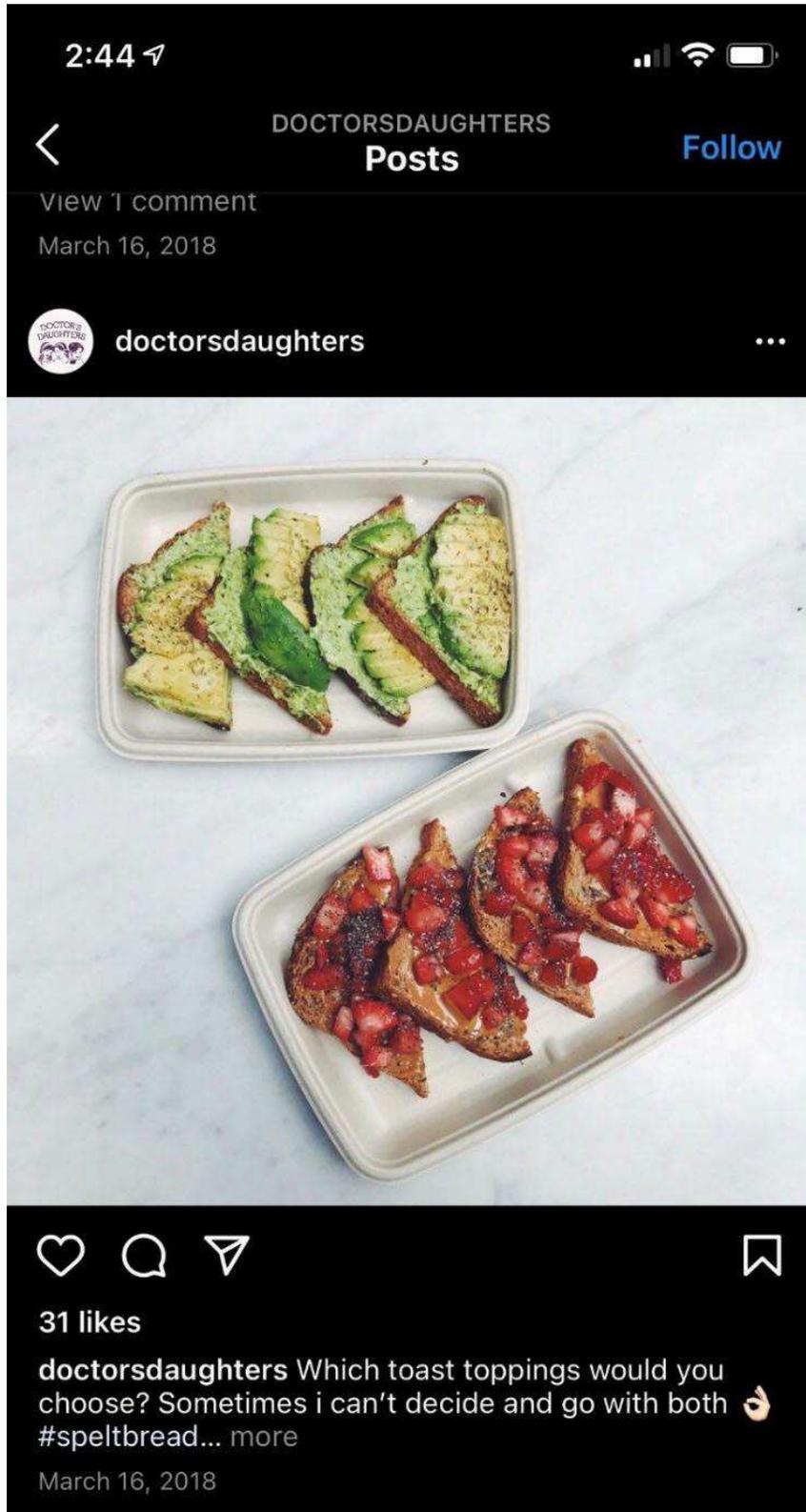
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion has been served on Applicant's attorney of record by e-mailing said copy on April 2, 2021 to David B. Sunshine, Esq. at dsunshine@cozen.com.

/Christopher A. DiSchino/  
Christopher A. DiSchino. Esq.  
Florida Bar No. 084127  
Email: christopher@dsmiami.com

Attorney for Opposer,  
Dani Fox, Associates, LLC

**EXHIBIT A**  
**APPLICANT'S MARCH 16, 2018 INSTAGRAM POST**



# EXHIBIT B

## APPLICANT'S MARCH 24, 2020 INSTAGRAM POST

3/26/2021

Doctors Daughters on Instagram: "Share in the comments below a new favorite activity or hobby you've begun at home. let's share our ideas and create ..."

Instagram

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Log In Sign Up

doctorsdaughters · Follow  
San Diego, California

doctorsdaughters Share in the comments below a new favorite activity or hobby you've begun at home. let's share our ideas and create a more positive atmosphere together 🌱  
I'll start, I'm video editing and finalizing some recipes to sell at farmers markets! one of them is pictured above 🍓

#positivethoughts #strength  
#nutritarian #quarantine #art #creative  
#handmade #instamood #highvibe  
#inspiration #life #love #mindfulness  
#mindset #motivation #positivevibes  
#smiles #positivity #vibes  
#wellbeing #healthandwellness

145 likes  
MARCH 24, 2020  
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Accessed via [www.instagram.com/doctorsdaughters](https://www.instagram.com/doctorsdaughters) on April 2, 2021

**EXHIBIT C**  
**APPLICANT'S JULY 9, 2020 INSTAGRAM POST**



Accessed via [www.instagram.com/doctorsdaughters](https://www.instagram.com/doctorsdaughters) on April 2, 2021

**EXHIBIT D**  
**DOCTORS' JULY 11, 2020 INSTAGRAM POST**



Accessed via [www.instagram.com/doctorsdaughters](https://www.instagram.com/doctorsdaughters) on April 2, 2021

**EXHIBIT E**  
**U.S. APPLICATION SERIAL NO. 90049470; TSDR STATUS**

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## DOCTOR'S DAUGHTERS

<b>Word Mark</b>	<b>DOCTOR'S DAUGHTERS</b>
<b>Goods and Services</b>	IC 030. US 046. G & S: Superfood rolled oats; dairy-free ice cream; dairy free-ice cream sandwiches
<b>Standard Characters Claimed</b>	
<b>Mark Drawing Code</b>	(4) STANDARD CHARACTER MARK
<b>Serial Number</b>	90049470
<b>Filing Date</b>	July 13, 2020
<b>Current Basis</b>	1B
<b>Original Filing Basis</b>	1B
<b>Published for Opposition</b>	January 26, 2021
<b>Owner</b>	(APPLICANT) Doctors Daughters LLC LIMITED LIABILITY COMPANY CALIFORNIA 1545 Calle Camille San Diego CALIFORNIA 92037
<b>Attorney of Record</b>	DAVID B. SUNSHINE
<b>Type of Mark</b>	TRADEMARK
<b>Register</b>	PRINCIPAL
<b>Live/Dead Indicator</b>	LIVE

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US Serial Number:	90049470	Application Filing Date: Jul. 13, 2020	
Register:	Principal		
Mark Type:	Trademark		
TM5 Common Status Descriptor:		LIVE/APPLICATION/Opposition Pending	
Status:	An opposition after publication is pending at the Trademark Trial and Appeal Board. For further information, see TTABVue on the Trademark Trial and Appeal Board web page.		
Status Date:	Jan. 26, 2021		
Publication Date:	Jan. 26, 2021		
<b>▼ Mark Information</b> <span style="float: right;">Expand All</span>			
Mark Literal Elements:	DOCTOR'S DAUGHTERS		
Standard Character Claim:	Yes. The mark consists of standard characters without claim to any particular font style, size, or color.		
Mark Drawing Type:	4 - STANDARD CHARACTER MARK		
<b>▼ Goods and Services</b>			
Note: The following symbols indicate that the registrant/owner has amended the goods/services: <ul style="list-style-type: none"> <li>Brackets [ ] indicate deleted goods/services;</li> <li>Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and</li> <li>Asterisks "*" identify additional (new) wording in the goods/services.</li> </ul>			
For:	Superfood rolled oats; dairy-free ice cream; dairy free-ice cream sandwiches		
International Class(es):	030 - Primary Class	U.S Class(es): 046	
Class Status:	ACTIVE		
Basis:	1(b)		
<b>▼ Basis Information (Case Level)</b>			
Filed Use:	No	Currently Use:	No
Filed ITU:	Yes	Currently ITU:	Yes
Filed 44D:	No	Currently 44E:	No
Filed 44E:	No	Currently 66A:	No
Filed 66A:	No	Currently No Basis:	No
Filed No Basis:	No		
<b>▼ Current Owner(s) Information</b>			
Owner Name:	Doctors Daughters LLC		
Owner Address:	1545 Calle Camille San Diego, CALIFORNIA UNITED STATES 92037		
Legal Entity Type:	LIMITED LIABILITY COMPANY	State or Country Where Organized: CALIFORNIA	
<b>▼ Attorney/Correspondence Information</b>			
<b>Attorney of Record</b>			
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		Correspondent e-mail Authorized: Yes	
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Date	Description	Proceeding Number	
Jan. 26, 2021	OPPOSITION INSTITUTED NO. 999999	267248	
Jan. 26, 2021	OPPOSITION PAPERS RECEIVED AT TTAB		
Jan. 26, 2021	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED		
Jan. 26, 2021	PUBLISHED FOR OPPOSITION		
Jan. 13, 2021	TEAS CHANGE OF CORRESPONDENCE RECEIVED		
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Jan. 13, 2021	TEAS REVOKE/APP/CHANGE ADDR OF ATTY/DOM REP RECEIVED		
Jan. 06, 2021	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED		
Nov. 20, 2020	APPROVED FOR PUB - PRINCIPAL REGISTER		
Nov. 11, 2020	TEAS/EMAIL CORRESPONDENCE ENTERED	88889	
Nov. 10, 2020	CORRESPONDENCE RECEIVED IN LAW OFFICE	88889	
Nov. 10, 2020	TEAS RESPONSE TO OFFICE ACTION RECEIVED		
Nov. 06, 2020	NOTIFICATION OF NON-FINAL ACTION E-MAILED	6325	

Nov. 06, 2020	NON-FINAL ACTION E-MAILED	6325
Nov. 06, 2020	NON-FINAL ACTION WRITTEN	94366
Oct. 23, 2020	ASSIGNED TO EXAMINER	94366
Aug. 09, 2020	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Jul. 16, 2020	NEW APPLICATION ENTERED IN TRAM	

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**TM Staff Information**

TM Attorney: TOPLAK, RIO NICE

Law Office Assigned: LAW OFFICE 127

**File Location**

Current Location: PUBLICATION AND ISSUE SECTION

Date in Location: Dec. 21, 2020

▼ **Assignment Abstract Of Title Information - None recorded**

▼ **Proceedings**

**Summary**

▼ Party type

▼ Proceeding type

Number of Proceedings: 1

▼ **Type of Proceeding: Opposition**

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Proceeding Number: [91267248](#)

Filing Date: Jan 26, 2021

Status: Pending

Status Date: Jan 26, 2021

Interlocutory Attorney: KATIE BUKRINSKY

**Defendant**

Name: Doctors Daughters LLC

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**Associated marks**

Mark	Application Status	Serial Number	Registration Number
DOCTOR'S DAUGHTERS	Opposition Pending	<a href="#">90049470</a>	

**Plaintiff(s)**

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**Associated marks**

Mark	Application Status	Serial Number	Registration Number
DOCTOR'S DAUGHTER	Registered	<a href="#">88445496</a>	<a href="#">6092249</a>

<b>Prosecution History</b>			
Entry Number	History Text	Date	Due Date
1	FILED AND FEE	Jan 26, 2021	
2	NOTICE AND TRIAL DATES SENT; ANSWER DUE:	Jan 26, 2021	Mar 07, 2021
3	INSTITUTED	Jan 26, 2021	
4	ANSWER AND COUNTERCLAIM ( FEE)	Mar 08, 2021	
5	ANSWER TO COUNTERCLAIM DUE ( DUE DATE)	Mar 11, 2021	Apr 10, 2021