

ESTTA Tracking number: **ESTTA1181503**

Filing date: **12/29/2021**

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

Proceeding no.	91272386
Party	Defendant Texarome, Inc.
Correspondence address	STEPHEN F.W. BALL, JR. WHITMYER IP GROUP LLC 600 SUMMER STREET STAMFORD, CT 06901 UNITED STATES Primary email: litigation@whipgroup.com Secondary email(s): sball@whipgroup.com, jalexander@whipgroup.com 203-703-0800
Submission	Answer
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Signature	/Stephen F. W. Ball, Jr./
Date	12/29/2021
Attachments	Answer to Notice of Opposition.pdf(175667 bytes )

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

<b>Gaines Group, LLC</b>	:	
	:	
<b>Opposer,</b>	:	
v.	:	<b>Opposition No. 91272386</b>
	:	
<b>Texarome, Inc.,</b>	:	
	:	
<b>Applicant.</b>	:	

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**U.S. Trademark Application Serial No. 90296351  
Mark: FARM TO FRAGRANCE**

**ANSWER TO NOTICE OF OPPOSITION**

Applicant, Texarome, Inc, (“Texarome” or “Applicant”) denies that Opposer is entitled to any relief sought in its Notice of Opposition and responds below to the numbered grounds for opposition in this matter as follows:

1. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 1 and therefore denies the same.
2. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 2 and therefore denies the same.
3. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 3 and therefore denies the same.
4. Admitted.
5. Admitted.
6. Denied.
7. Denied.
8. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 8 and subparagraphs a-f and therefore denies the same.
9. Applicant admits that Exhibit B is dated October 1, 2018 and Exhibit E is dated February 11, 2018 and that these dates predated Applicant’s filing date and denies the remaining allegations of paragraph 9.
10. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 10 and therefore denies the same.

11. Denied.
12. Denied.
13. Denied.
14. Applicant is without knowledge sufficient to form a belief as to the truth of the allegations in paragraph 14 and therefore denies the same.

WHEREFORE, Applicant requests that the Opposition be denied; that Application Serial No. 90296351 be allowed to register; and for such further relief as may be proper.

Respectfully submitted,  
Texarome, Inc.

December 29, 2021

/s/ Stephen F.W. Ball, Jr.  
Stephen F.W. Ball, Jr.  
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**CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** was served by electronic mail on the Counsel for the Opposer as follows:

Sui Q. Duong  
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December 29, 2021  
Date

/s/ Joan M. Burnett  
Joan M. Burnett