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Filing date: **07/29/2022**

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

Proceeding no.	91276908
Party	Defendant SHENZHEN MUJE TECHNOLOGY CO., LTD
Correspondence address	CURTIS HUSSEY BREALANT 500 WESTOVER DR #15266 SANFORD, NC 27330 UNITED STATES Primary email: ipus3@brealant.com Secondary email(s): 2885328446@qq.com No phone number provided
Submission	Answer
Filer's name	Adedamola Ito Fakunle
Filer's email	dfakunle@damolalegal.com
Signature	/Adedamola Ito Fakunle/
Date	07/29/2022
Attachments	D_Answer_Lucky Bar.pdf(69041 bytes)

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

REYNOLDS BRANDS INC.,
Opposer,

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Opposition No. 91276908

v.

SHENZHEN MUJE TECHNOLOGY
CO., LTD
Applicant.

Mark: LUCKY BAR
U.S. Serial No.: 97051552

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant, Shenzhen Muje Technology Co., Ltd. (hereinafter “Applicant”), by and through its attorney, hereby answers the Notice of Opposition (the “Opposition”) filed by Reynolds Brands Inc. (hereinafter “Opposer”) on June 22, 2022. Applicant hereby responds, solely for the purpose of this proceeding, to each of the grounds set forth in the Notice of Opposition:

1. Applicant is without sufficient knowledge or information sufficient to form a belief as to the truth of the matters alleged in Paragraph 1 of the Opposition and, therefore, denies the same.
2. Applicant is without sufficient knowledge or information sufficient to form a belief as to the truth of the matters alleged in Paragraph 2 of the Opposition and, therefore, denies the same.
3. Applicant is without sufficient knowledge or information sufficient to form a belief as to the truth of the matters alleged in Paragraph 3 of the Opposition and, therefore, denies the same.
4. Applicant admits the allegations in Paragraph 4 of the Opposition.
5. Applicant admits the allegations in Paragraph 5 of the Opposition.
6. Applicant denies the allegations in Paragraph 6 of the Opposition.
7. Applicant denies the allegations in Paragraph 7 of the Opposition.
8. Applicant denies the allegations in Paragraph 8 of the Opposition.
9. Applicant denies the allegations in Paragraph 9 of the Opposition.

10. Applicant denies the allegations in Paragraph 10 of the Opposition.
11. Applicant denies the allegations in Paragraph 11 of the Opposition.
12. Applicant denies the allegations in Paragraph 12 of the Opposition.
13. Applicant denies the allegations in Paragraph 13 of the Opposition.
14. Applicant denies the allegations in Paragraph 14 of the Opposition.

PRAYER FOR RELIEF

Applicant believes there is no likelihood of confusion with Opposer's Marks and therefore Opposer is not wrongfully injured or damaged by registration of the mark as requested by U.S. Application 97051552. WHEREFORE, Applicant prays:

- A. That this action be dismissed in its entirety with prejudice; and
- B. That Applicant have such other and further relief as the Board may deem just and proper.

Date: July 29, 2022

Respectfully Submitted,
s/Adedamola Fakunle/
Adedamola Fakunle
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ATTORNEY FOR APPLICANT

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above document was sent to the Opposer on July 29, 2022, via emails to Opposer's counsel on record:

bbryner@kilpatricktownsend.com; totey@kilpatricktownsend.com;

eyates@kilpatricktownsend.com

s/Adedamola Fakunle/
Adedamola Fakunle
ATTORNEY FOR APPLICANT