

ESTTA Tracking number: **ESTTA1252759**

Filing date: **12/07/2022**

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

Proceeding no.	91281471
Party	Defendant Flavorful Brands, LLC
Correspondence address	MARGARET NIVER MCGANN PARSONS BEHLE & LATIMER 201 SOUTH MAIN STREET, SUITE 1800 SALT LAKE CITY, UT 84111 UNITED STATES Primary email: trademarks@parsonsbehle.com 801-532-1234
Submission	Answer
Filer's name	Jonathan H. Love
Filer's email	trademarks@parsonsbehle.com
Signature	/Jonathan Love/
Date	12/07/2022
Attachments	24299_035US80_Answer to Notice of Opposition.pdf(90849 bytes )

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

WONDERFUL CITRUS LLC,

Opposer,

v.

FLAVORFUL BRANDS, LLC,

Applicant.

Opposition No. 91281471

Application Serial No. 97/047,364

Mark:



**ANSWER TO NOTICE OF OPPOSITION**

Applicant, Flavorful Brands, LLC, (“Applicant”) answers the Notice of Opposition (“Opposition”) filed by Wonderful Citrus LLC (“Opposer”) as follows:

Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations regarding Opposer’s location as contained in the preamble and, therefore, denies them. Applicant denies that Opposer has been or will be damaged by registration of Applicant’s Mark as claimed in the preamble to the Opposition.

1. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1 of the Opposition and, therefore, denies them.

2. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 2 of the Opposition and, therefore, denies them.

3. The allegations in Paragraph 3 of the Opposition are not factual statements but rather are conclusions of law to which no answer is required. To the extent an answer is warranted,

Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 3 of the Opposition and, therefore, denies them.

4. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 4 of the Opposition and, therefore, denies them.

5. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 5 of the Opposition and, therefore, denies them.

6. Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 6 of the Opposition and, therefore, denies them.

7. The allegations in Paragraph 7 of the Opposition are not factual statements but rather are conclusions of law to which no answer is required. To the extent an answer is warranted, Applicant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 7 of the Opposition and, therefore, denies them.

8. As to Paragraph 8 of the Opposition, Applicant denies the implication that Opposer's consent is a prerequisite to Applicants use and/or registration of Applicant's mark.

9. The allegations in Paragraph 3 of the Opposition are not factual statements but rather are conclusions of law to which no answer is required. To the extent an answer is warranted, the USPTO records speak for themselves.

10. Applicant hereby incorporates its responses set forth in each of the proceeding paragraphs as if fully set forth herein.

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.

WHEREFORE, Applicant prays that the Board deny the Opposition and allow Applicant's Application to proceed to registration.

DATED: December 7, 2022.

PARSONS BEHLE & LATIMER

/ Jonathan H. Love/

Margaret N. McGann

Jonathan H. Love

201 South Main Street, Suite 1800

Salt Lake City, UT 84111

Phone: 801-532-1234

Fax: 801-536-6111

*Attorneys for Flavorful Brands, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Answer to Notice of Opposition was served on Wonderful Citrus LLC by forwarding said copy on December 7, 2022, by email to:

Danielle M. Criona  
Roll Law Group P.C.  
11444 West Olympic Blvd., 7th Floor  
Los Angeles, Ca 90064  
danielle.criona@roll.com  
ipdocketing@roll.com

Attorneys for Opposer, Wonderful Citrus LLC

/Jonathan H. Love/