

ESTTA Tracking number: **ESTTA1297731**

Filing date: **07/17/2023**

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

Proceeding no.	91285874
Party	Defendant Isaias Santanas Diaz
Correspondence address	ISAIAS SANTANAS DIAZ 14843 SW 67 LANE MIAMI, FL 33193 UNITED STATES Primary email: sanisaias@aol.com Secondary email(s): sanisaias@aol.com 305-898-8621
Submission	Answer
Filer's name	ISAIAS SANTANA DIAZ
Filer's email	SANISAIAS@AOL.COM
Signature	/ISAIAS SANTANA DIAZ/
Date	07/17/2023
Attachments	Answer and Grounds of Defense - Ruffino S.r.l. v. Isaias Santanas Diaz.pdf(136057 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

In the matter of Trademark Application Serial No. 97/359,546,
For the mark LUMINA,

Ruffino S.r.l.	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91285874
	:	
Isaias Santanas Diaz	:	
	:	
Applicant.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW the Applicant, Isaias Santanas Diaz (hereinafter “Applicant”) and files its Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

1. Applicant is without knowledge of the allegation and therefore denies the same.
2. Applicant is without knowledge of the allegation and therefore denies the same.
3. Applicant is without knowledge of the allegation and therefore denies the same.
4. Applicant is without knowledge of the allegation and therefore denies the same.
5. Applicant is without knowledge of the allegation and therefore denies the same.
6. Applicant is without knowledge of the allegation and therefore denies the same.
7. Applicant is without knowledge of the allegation and therefore denies the same.
8. Applicant is without knowledge of the allegation and therefore denies the same.
9. Applicant is without knowledge of the allegation and therefore denies the same.
10. Applicant is without knowledge of the allegation and therefore denies the same.

11. Applicant is without knowledge of the allegation and therefore denies the same.
12. Applicant is without knowledge of the allegation and therefore denies the same.
13. Applicant is without knowledge of the allegation and therefore denies the same.
14. Applicant is without knowledge of the allegation and therefore denies the same.

Applicant further denied all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of the Answer and Grounds of Defense.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

DATED this 13th day of July, 2023.

/Isaias Santanas Diaz/
Isaias Santanas Diaz
14843 SW 67 Lane
Miami, FL 33193

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For the mark LUMINA,

Ruffino S.r.l.	:	
	:	
Opposer,	:	
	:	
vs.	:	Opposition No. 91285874
	:	
Isaias Santanas Diaz	:	
	:	
Applicant.	:	

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Answer and Grounds of Defense to
be served this 13th day of July, 2023 via first-class mail upon:

EDWARD F. MALUF
SEYFARTH SHAW LLP
620 EIGHTH AVE., 32ND FLOOR
NEW YORK, NY 10018

/Isaias Santanas Diaz/
Isaias Santanas Diaz