

TTAB

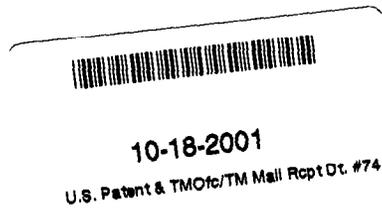
Application Serial No. 76/191,390  
Attorney Docket: 53375/1458

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

Olympus Optical Co., Ltd., )  
)  
Opposer, )  
)  
v. )  
)  
Wright Medical Technology, Inc. )  
)  
Applicant. )

Opposition No. \_\_\_\_\_  
  
Application Serial No. 76/191,390  
Mark: OLYMPIA  
Filed on January 9, 2001  
  
Published in the Official Gazette  
August 21, 2001, TM Page 282

TO: BOX TTAB  
FEE  
Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, Virginia 22202-3513



OPPOSER: Olympus Optical Co., Ltd.  
2-3, Kuboyama-cho  
Hachioji-shi, Tokyo 192 Japan

**Notice Of Opposition**

As grounds for opposition, Olympus Optical Co., Ltd. alleges as follows:

1. Olympus Optical Co., Ltd. ("Olympus"), a joint stock company duly organized under the laws of Japan, having a place of business at 2-3 Kuboyama-cho Hachioji-shi, Tokyo, 192 Japan, through its counsel, Kenyon & Kenyon, 333 West San Carlos St., Suite 600, San Jose, CA 95110, respectfully, believing that it will be damaged by registration of the designation "OLYMPIA" shown in Serial No. 76/191,390, hereby opposes the same, with knowledge concerning its own acts and on information and belief as to all other allegations.

2. Wright Medical Technology, Inc. ("WMT") is the owner of application Serial No. 76/191,390 for the designation OLYMPIA, in International Class 010 for use in connection with "medical apparatus, namely, orthopaedic implants and related surgical instrumentation."

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3. WMT filed its application on January 9, 2001, under the Intent to Use provisions of section 1(b) of the Trademark Act.

4. The PTO published the application for opposition in the Official Gazette of August 21, 2001, for use of the designation in connection with the same goods and services originally applied for, with no modifications.

5. Olympus timely filed a request for an extension of time to oppose that WMT application and is timely filing this Notice of Opposition within such extended period.

6. Olympus owns broad common law trademark and trade name rights in the OLYMPUS name.

7. Olympus also is the owner of numerous active registrations and pending applications to register the term OLYMPUS (in whole or in part) with the PTO as a trademark in International Class 010 for a wide range of medical devices, including for the following marks:

	<b>Serial Number</b>	<b>Reg. Number</b>	<b>Word Mark</b>
1	76155881		OLYMPUS OLA
2	76278965		OLYMPUS
3	76223340		OLYMPUS CF TYPE H260AL
4	76223334		OLYMPUS GIF TYPE H260
5	76223273		OLYMPUS CF TYPE H260AI
7	75518602		ET OLYMPUS ENDO-THERAPY
8	75529210		OLYMPUS PORTAVIEW
9	74169722	2388938	OLYMPUS KEYMED
10	74419865		OLYMPUS VISION KEEPING THE FUTURE IN SIGHT
11	74221388	2365504	OLYMPUS
12	74021609	1709267	OLYMPUS AF
13	73614482	1466270	OLYMPUS URF
14	73564892	1425630	OLYMPUS PF
15	73465672	1310940	OLYMPUS MU-1
16	73403771	1287011	OLYMPUS CHF
17	73388580	1275975	OLYMPUS OSF

	<b>Serial Number</b>	<b>Reg. Number</b>	<b>Word Mark</b>
18	73015513	1044043	OLYMPUS

8. A partial description of Olympus' U.S. trademark rights appears in the attached Exhibit A to this Notice of Opposition.

9. Olympus adopted and first used the OLYMPUS mark identified in Registration No. 1,044,043 at least as early as May 1952, and first used the mark in commerce in December 1962. Thus, Olympus has been using its OLYMPUS marks in connection with medical devices long prior to the date WMT filed its Intent to Use application to register the OLYMPIA designation.

10. Olympus also has a pending Intent to Use application, Serial No. 76/278,965, filed July 2, 2001, to register the term OLYMPUS, in International Class 010 for use with, among other things, "artificial limbs, eyes and teeth and orthopedic articles."

11. Moreover, Olympus has numerous other registrations for the OLYMPUS mark for other goods and services, and by virtue of its long, extensive and widely promoted use the OLYMPUS mark and name the OLYMPUS mark is well known and famous.

12. Olympus has invested and continues to invest substantial amounts of money and effort in the development, advertising, promotion and marketing of its OLYMPUS branded products and services in the medical device field and otherwise to consumers. By its aforesaid use of the OLYMPUS marks, and its promotional efforts in connection therewith, OLYMPUS has built up valuable goodwill associated with these marks, and because of such use, advertising, promotion and marketing, the OLYMPUS marks have acquired substantial secondary meaning in the minds of both the trade and public in connection with Olympus and its goods, and fame as that term is used in connection with the anti-dilution provisions of the Lanham Act, § 43(c).

13. Through its use of the OLYMPUS marks in connection with medical devices and services, these marks have become well known to the trade and purchasing public, and Olympus is identified as the source of all goods and services sold in connection with these marks.

**LIKELIHOOD OF CONFUSION**

14. The OLYMPUS marks are arbitrary, and no other entity uses any similar mark in connection with medical devices. Accordingly, these marks are strong and entitled to a broad degree of protection.

15. WMT plans to sell (or is selling) its goods under the OLYMPIA designation to a variety of customers, many of whom are likely to be familiar with, or actual purchasers of, the products sold in connection with the OLYMPUS marks. Thus, any medical facility or practitioner who purchases or encounters WMT's OLYMPIA products is very likely to have previously been exposed to OLYMPUS branded products.

16. The identified goods in connection with which WMT intends to use the proposed OLYMPIA designation are closely related if not identical to the goods in connection with which Olympus has used, continues to use and is likely in the future to use its OLYMPUS marks.

17. WMT's OLYMPIA DESIGNATION, as proposed for use for medical devices, so resembles the OLYMPUS marks, also used in connection with medical devices, as to be likely to cause confusion, or to cause mistake, or to deceive.

18. Specifically, WMT's use of the proposed OLYMPIA mark is likely to create the erroneous impression that: (i) Olympus and WMT are somehow related or associated, (ii) that Olympus sponsors or approves of WMT's OLYMPIA branded goods, or (iii) that Olympus is the source or origin thereof.

19. Furthermore, any objection or fault found with WMT's goods would necessarily reflect upon and seriously injure the reputation that Olympus has established for its goods and services offered in connection with the OLYMPUS marks and in Olympus itself.

20. Accordingly, the Board should refuse registration for the OLYMPIA mark applied for under Serial No. 76/191,390 under the provisions of § 2(d) of the Lanham Act, 15 U.S.C. § 1052(d), because it "[c]onsists of or comprises a mark which so resembles . . . a mark or trade name previously used in the United States by another and not abandoned, as to be likely, when

used on or in connection with the goods of the applicant, to cause confusion, or to cause mistake, or to deceive . . ."

**DILUTION**

21. WMT's use and/or registration of the OLYMPIA designation in connection with the medical devices set forth in Application Serial No. 76/191,390 will dilute and/or impair Olympus' rights in the OLYMPUS marks, and will eventually result in a lack of designation or indication of origin and/or a loss of the distinctiveness and/or exclusivity Olympus currently possesses in the OLYMPUS marks.

22. Accordingly, the Board should also refuse registration for the mark applied for under Serial No. 76/191,390 under the provisions of §§ 18 and 43(c) of the Lanham Act.; *see Boral Ltd. v. FMC Corp.*, Opposition No. 108,966, 2000 WL 33321175 at \*2 (TTAB March 29, 2000).

**ADDITIONAL HARM**

23. WMT's use and/or registration of the OLYMPIA mark will also result in loss of sales to Olympus, damage and injury to its reputation, loss of goodwill in the OLYMPUS marks and other damages to Olympus.

24. WHEREFORE, Olympus prays that the Board reject and refuse Application Serial No. 76/191,390, that it refuse to issue a registration to WMT, and that it sustain this opposition in favor Olympus Optical, Co., Ltd.

Please address all future communications regarding this opposition to:

Allen J. Baden  
Kevin G. Daley  
KENYON & KENYON  
333 West San Carlos Street  
San Jose, California 95110  
Telephone: (408) 975-7500  
Facsimile: (408) 975-7501

The undersigned counsel is filing this Notice of Opposition in duplicate, pursuant to 37 C.F.R. § 2.104(a). Please charge the filing fee of \$300.00, and any other fees associated with this proceeding to Deposit Account 11-0600.

Respectfully submitted,



Dated: October 18, 2001

---

Allen J. Baden  
Kevin G. Daley  
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333 West San Carlos Street  
San Jose, California 95110  
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Attorneys for Petitioner

Of Counsel:

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One Broadway  
New York, New York 10004  
Telephone: (212) 425-7200

PARTIAL LIST OF OLYMPUS REGISTRATIONS

1. Registration No. 1,614,689 for the mark OLYMPUS for "medical laboratory analysis equipment; namely, endoscopes and clinical blood analyzers."
2. Registration No. 1,466,270 for the mark OLYMPUS URF for "endoscopes."
3. Registration No. 1,425,630 for the mark OLYMPUS PF "medical endoscopes."
4. Registration No. 1,437,114 for the mark OLYMPUS for "camera straps."
5. Registration No. 1,310,940 for the mark OLYMPUS MU-1 for "endoscope maintenance pumps."
6. Registration No. 1,264,106 for the mark OLYMPUS SCI6-3 for "photographic cameras for use with endoscopes."
7. Registration No. 1,287,011 for the mark OLYMPUS CHF for "endoscopes."
8. Registration No. 1,275,975 for the mark OLYMPUS OSF for "medical fiberscopes."
9. Registration No. 1,240,989 for the mark OLYMPUS for "audio tape recorders."
10. Registration No. 1,162,543 for the mark OLYMPUS TOKYO and Design for "microscopes, parts and accessories thereof, namely, objectives, eyepieces, phase contrast attachments, mechanical stages, dark field condensers, illuminators and transformers, photomicrographic cameras; photographic apparatus for fiberscopes."
11. Registration No. 1,084,573 for the mark OLYMPUS TRIP 35 for "photographic cameras, parts and accessories thereof, namely, lenses, lens hoods, filters, filter cases, self timers, carrying cases and carrying straps."
12. Registration No. 1,044,043 for the mark OLYMPUS for "medical equipment and appliances for use on the human body in connection with therapy or treatment, sold as a complete set containing optionally one or more of the following: gastro cameras, parts and accessories thereof, namely, films, air blower, film viewer, film numbering stylus, mouthpieces, bulb remover, distal end protector, gastro film projector, power regulator, plastic support for film numbering, dust cover, washing attachment for camera cap, spare caps, camera cords, spare lamp holder, sealing grease, and driver for fastening lamp holder; fiberscopes, parts and accessories thereof, namely, cold light supply, biopsy forceps, fluid container, suction tube, spare rubber hoods, spare rubber lid for forceps opening, spare lamp, anal dilator, vinyl cover, protection cap for light guide, eyepiece cap, washing tube, lens cleaner, washing rubber blower, carrying case diopter lens, mouthpieces, syringe with cystology brush, flushing pump, cannulas with stylet, diathermic snares, lecture scopes, and tracheal tube with stylus; operation microscopes, parts and accessories thereof, namely stand binocular tubes, eyepieces, objectives, photographic camera for microphotography, camera adapter, camera holder, flash attachment, photo lenses and focusing eyepieces."
13. Registration No. 647,456 for the mark OLYMPUS for "microscopes and parts and accessories for the same; micro-photographic apparatus, phase contrast accessories for microscopes including current condensers, objectives of phase contrast, centering telescopes, filters; universal light source suitable for

- microphotography and phase contrast, microphotographic attachments for microscopes, dark field condensers, binocular attachments, monocular attachments, micrometer eyepieces, mechanical stages objective micrometers, eyepiece micrometers, mirror and mirror supports, micro-interometers, microspectrophotometers, gastro cameras (stomach cameras), and parts and attachments for the same, and photographic cameras and parts and accessories for the same, namely, lenses, auto-up attachments of lenses for close-ups, lens hoods, filter sets, flash units, film magazines.”
14. Registration No. 1,709,267 for the mark OLYMPUS AF for “endoscopes for medical and surgical use.”
  15. Registration No. 1,519,663 for the mark OLYMPUS KMI for “light source apparatus and video analyzers for use with endoscopes for industrial and technical use.”
  16. Registration No. 1,497,388 for the mark OLYMPUS for “clinical diagnosis reagents.”
  17. Registration No. 1,452,528 for the mark OLYMPUS for “maintenance and repair of photographic, optical, fine mechanical, electrical, electronic, surgical and medical equipment.”
  18. Registration No. 1,293,976 for the mark OLYMPUS DEMAND for “random access computer analyzer for use in testing body fluids, human or otherwise.”

PARTIAL LIST OF OLYMPUS’ PENDING TRADEMARK APPLICATIONS

19. Application Serial No. 73/689,821 for the mark OLYMPUS MCL for “laser apparatus for medical and surgical use.”
20. Application Serial No. 74/565,912 for the mark OLYMPUS and Design for “providing extended repair services warranty contracts in the field of endoscopy.”
21. Application Serial No. 74/586,037 for the mark OLYMPUS CLASSIC for “photographic cameras.”
22. Application Serial No. 74/438,560 for the mark OLYMPUS ENDO-NOMICS for “financing services for endoscopy equipment; lease-purchase programs for endoscopy equipment.”
23. Application Serial No. 74/435,588 for the mark OLYMPUS PORTAVIEW for “videoscope based video imaging systems comprised of a videoscope, a camera control unit, a light source and a video monitor; and fiberscope or rigid borescope based video imaging systems comprised of a fiberscope of rigid borescope, a charge coupled device camera, a video monitor and a light source.”
24. Application Serial No. 74/419,865 for the mark OLYMPUS VISION KEEPING THE FUTURE IN SIGHT and Design for “video imaging apparatus for use in the medical field.”
25. Application Serial No. 74/169,722 for the mark OLYMPUS KEYMED and Design for “house mark for endoscopic and borescopic support equipment; house

- mark for endoscopes and borescopes as used in surgical, medical, dental and veterinarian fields.”
26. Application Serial No. 74/229,360 for the mark OLYMPUS SLIDEMAKER for “software program for image technology in the medical field.”
  27. Application Serial No. 75/118,379 for the mark OLYMPUS DIGITAL VISION for “digital cameras and their peripherals such as detachable memory cards, card-type TV and printer adapters, digital printers and their consumables, films and flat bed scanners, software for image and text processing, software for communications of image and/or text files, software for Internet communications support and data transmitters.”
  28. Application Serial No. 75/193,670 for the mark OLYMPUS PSU for “power source apparatus for surgical operation instruments.”
  29. Application Serial No. 75/178,526 for the mark OLYMPUS FINANCIAL SERVICES for “general financial service offerings, asset management programs, leasing, rental and loan services, all relating to medical equipment.”
  30. Application Serial No. 75/486,236 for the mark OLYMPUS GOLD TIP 5 YEAR GUARANTEE for “warranty and maintenance servicing program for medical equipment.”
  31. Application Serial No. 74/221,388 for the mark OLYMPUS for “machines for washing endoscopes (Int. Cl. 9) video cameras and recorders; magnetic tapes for recording sound and images; scanning acoustic microscopes; endoscopes for industrial use, and light source and control apparatus thereof; and data processing apparatus, computers, computer monitors, printers and data processing programs, none being for office use (Int. Cl. 10) electronic endoscopes for medical and surgical use, and light source and control apparatus therefor; and apparatus for thermal cautery.”
  32. Application Serial No. 75/214,129 for the mark OLYMPUS for “toner and developer for printer and plotters (Int. Cl. 9) data processing apparatus, namely, computers, computer monitors, printers, plotters, scanners, bar code readers, and paper feeders and sorters for computers, floppy disk recording and reproducing apparatus, magneto-optical disk recording and reproducing apparatus, digital still cameras, digital still image recorders, AC adopters, digital color printers, computer programs, adopters for communications, memory cards and batteries for digital still cameras, computer programs for business office work and medical data and image storage and retrieval; optical card reading and writing apparatus; magnetic, optical and electronic recording media and recording disks; dictating machines, and automatic answering telephone sets; color monitor visual display headsets; dot code readers; dot code writers, voice recorders, image scanners, still video cameras, optical character readers, digital signal processors, computer programs for encoding and/or decoding sound, images, characters and/or data; spreadsheet programs, database program, word processing programs, authoring programs, computer programs for waveform shaping, optical character reading, midi, musical composition, musical score writing, telecommunication, scientific calculation and analysis, cad, cam, and/or three-dimensional drawing (Int. Cl. 16)

paper, copying paper, carbon paper, ink ribbons, printed publications, books, magazines, photographs, data processing programs, newspapers; instruction manuals; character cards; greeting cards; photographs; maps; calendars; sheets of music; bookmarks; plastic sheet for overhead projectors; adhesive tapes and stickers (Int. Cl. 37) maintenance and repair electrical, electronic and data processing apparatuses and instruments (Int. Cl. 42) encoding of sound, image, characters and/or data.”

33. Application Serial No. 76/162421 for the mark OLYMPUS for “advertising and publicity; providing information on commodity sales; referral services; auctioneering; and import-export clearance agencies; financing services; repair or maintenance of medical machines and apparatus, photographic machines and apparatus, optical machines and instruments, measuring and testing machines and instruments, telecommunication machines and apparatus, computers [including "central processing units, programmed-data-encoded electronic circuits, magnetic disks, magnetic tapes and other peripheral equipment"], and laboratory apparatus and instruments; communication by computer terminals; photographic enlarging; photographic printing; photographic film development; and rental of machines and apparatus for film development, photographic printing, photographic enlargement or photographic finishing; rental of television sets, and radio sets; and photo contests; photography; providing employment information; computer software design, computer programming or maintenance of computer software; providing medical information; rental of cameras, optical machines and instruments, measuring apparatus, medical machines and apparatus, and laboratory apparatus and instruments; computer rental [including "central processing units, programmed-data-encoded electronic circuits, magnet disks, magnetic tapes and other peripheral equipment"]; and online interactive costumer support.”
34. Application Serial No. 76/278965 for the mark OLYMPUS for “photographic cameras; digital cameras; tape recorders and tapes; IC recorders; optical, acoustic and scanning microscopes; measuring equipment; goggle-type color monitors; binoculars; batteries; magneto-optical disk photographic cameras; digital cameras; tape recorders and tapes; IC recorders; optical, acoustic and scanning microscopes; measuring equipment; goggle-type color monitors; binoculars; batteries; magneto-optical disk drives; printers; bar-code scanners; dot-code readers and writers; computers and computer peripherals; computer software in this class; copying machines; endoscopes for industrial use; and parts and accessories for the aforementioned goods; printers; bar-code scanners; dot-code readers and writers; computers and computer peripherals; computer software in this class; copying machines; endoscopes for industrial use; and parts and accessories for the aforementioned goods; medical and surgical endoscopes; ultrasonic diagnostic equipment; surgical microscopes; clinical analyzers; furniture and beds for endoscopic examination purposes; artificial limbs, eyes and teeth; orthopedic articles; suture materials; and parts and accessories for the aforementioned goods.”

CERTIFICATE OF MAILING

Express Mail mailing label number: EL566278513US

Date of Deposit: October 18, 2001

I hereby certify that on October 18, 2001, an original and one copy of the foregoing NOTICE OF OPPOSITION was deposited with the United States Postal Service utilizing Express Mail Post Office to Addressee service under 37 C.F.R. 1.10, addressed to the Assistant Commissioner for Trademarks, Box TTAB, 2900 Crystal Drive, Arlington, VA 22202-3513.

  
\_\_\_\_\_  
I. Marie Kotsubo

EXHIBIT A

TM 282

OFFICIAL GAZETTE

AUGUST 21, 2001

**CLASS 10—(Continued).**

SN 76-188,862. KAO KABUSHIKI KAISHA, AKA KAO CORPORATION, TOKYO 103-8210, JAPAN, FILED 1-2-2001.

**EYEFEEEL**

FOR NON-MEDICATED SELF-HEATING PADS FOR PERSONAL USE FOR THE RELIEF OF EYESTRAIN; NON-MEDICATED SELF-COOLING PADS FOR PERSONAL USE FOR THE RELIEF OF EYESTRAIN (U.S. CLS. 26, 39 AND 44).

**CLASS 10—(Continued).**

SN 76-192,151. STRYKER CORPORATION, HOPKINTON, MA. FILED 1-11-2001.



FOR OSTEOGENIC GRAFT MATERIAL FOR SKELETAL REPAIR AND REGENERATION (U.S. CLS. 26, 39 AND 44).

SN 76-189,296. ARY LIFT, INC., SHALLOTTE, NC. FILED 1-3-2001.

**ARYCARE**

OWNER OF U.S. REG. NO. 1,869,438.  
FOR MEDICAL APPARATUS FOR LIFTING MEDICAL PATIENTS FROM BEDS (U.S. CLS. 26, 39 AND 44).  
FIRST USE 7-0-2000; IN COMMERCE 7-0-2000.

SN 76-192,194. SIMM, KENDELL, HUNTINGTON BEACH, CA. FILED 1-8-2001.

**GUARDZIT**

FOR CONTAINERS FOR RECEIVING, STORING, TRANSPORTING, AND DISPOSING OF MEDICAL WASTE; NAMELY, NEEDLES, MEDICAL SHARPS, AND OTHER HAZARDOUS MATERIALS (U.S. CLS. 26, 39 AND 44).

SN 76-191,390. WRIGHT MEDICAL TECHNOLOGY, INC., ARLINGTON, TN. FILED 1-9-2001.

**OLYMPIA**

FOR MEDICAL APPARATUS, NAMELY, ORTHOPEDIC IMPLANTS AND RELATED SURGICAL INSTRUMENTATION THEREFOR (U.S. CLS. 26, 39 AND 44).

SN 76-192,281. SCIMED LIFE SYSTEMS, INC., MAPLE GROVE, MN. FILED 1-10-2001.

**MATRIX**

FOR EMBOLIZATION COILS (U.S. CLS. 26, 39 AND 44).

SN 76-192,408. SCIMED LIFE SYSTEMS, INC., MAPLE GROVE, MN. FILED 1-10-2001.

**FLUID DOCK**

FOR FILLING DEVICE FOR CATHETERS (U.S. CLS. 26, 39 AND 44).

SN 76-191,745. APPLIED MEDICAL RESOURCES CORPORATION, RANCHO SANTA MARGARITA, CA. FILED 1-9-2001.

**R-11**

FOR MEDICAL AND SURGICAL DEVICES, NAMELY LAPAROSCOPIC, AND VASCULAR INSTRUMENTS, AND ACCESSORIES THEREOF (U.S. CLS. 26, 39 AND 44).

SN 76-192,552. BAXTER INTERNATIONAL INC., DEERFIELD, IL. FILED 1-11-2001.

**CHEMO-MATE**

FOR MEDICAL DEVICE; SPECIFICALLY, A MEDICAL SPIKE USED TO PENETRATE A VIAL STOPPER (U.S. CLS. 26, 39 AND 44).

**KENYON & KENYON**  
**INTELLECTUAL**  
**PROPERTY LAW**

333 WEST SAN CARLOS ST., SIXTH FLOOR  
SAN JOSE, CA 95110 WWW.KENYON.COM  
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ATTY: REF. NO. 53375/1458

10-18-2001

October 18, 2001

U.S. Patent & TMOfo/TM Mail Ropt Dt. #74

**VIA EXPRESS MAIL NO. EL566278513US**

Commissioner for Trademarks  
Box TTAB FEE  
2900 Crystal Drive  
Arlington, Virginia 22202-3513

Re: Olympus Optical Co., Ltd., Opposer  
Wright Medical Technology, Inc., Applicant  
Mark: OLYMPIA  
Filed on: January 9, 2001  
Application Serial No.: 76/191,390  
Published in the Official Gazette August 21, 2001, TM Page 282

Dear Sir:

Enclosed herewith for filing in the above-identified matter are the following:

Notice of Opposition with Exhibit A (in duplicate); and  
Postcard for date-stamped return as confirmation of receipt of these items.

Please charge the filing fee of \$300.00 (1 Class), and any other fees associated with this proceeding to Deposit Account No. 11-0600.

Very truly yours,

Allen J. Baden

**Certificate of Mailing (37 C.F.R. 1.10(a)) By Express Mail**

I certify that this correspondence is being deposited with the U.S. Postal Service "Express Mail Post Office to Addressee" under 37 C.F.R. 1.10 as Express Mail No. EL566278513US, addressed to the Commissioner for Trademarks, Box TTAB FEE, 2900 Crystal Drive, Arlington, Virginia 22202-3513, on October 18, 2001, by I. Marie Kotsubo.

Date: 10/18/01