

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

**In the Matter of Application:**



**Applicant: Akos Simon  
Serial No: 78039658  
Mark: pacBelly**

05-16-2002

U.S. Patent & TMO/TM Mail Rcpt Dt. #74

**BRIEF**

05/09/2002  
02 MAY 28 AM 9:23  
TRADEMARK TRIAL AND  
APPEAL BOARD

"pacBelly" was carefully researched by the registry and by the trademark Examining Attorney that has approved it.

"pacBelly" does not in any shape way or form represent any other trademark in part or in whole to the consumer or mistakenly conclude that "pacBelly" is in conjunction to the "Bell" trademark or any other mark just because it contains the four letter word bell in fact there are hundreds if not thousands of registered trademarks that contain the four letter word "Bell" as you can see in exhibit "A" and "B" so are they all or in part in some sort of conflict as the "opposer" believes it will be damaged by the registration of the mark set to be believed in the notice of opposition, "pacBelly" unlike the mark "Bell" that has approximate 1600 registered marks that contain the word "Bell" , "pacBelly" is a stand alone one word and does not represent any other word or marks.

*Simon H. Akos*

Simon Akos  
P.O. Box 8173  
GreenValley Lake, CA. 92341-8173

**CERTIFICATE OF MAILING**

I hereby certify that on this 9<sup>th</sup>. Day of May ,2002 the foregoing BRIEF is being deposited with the United States Postal Service, postage prepaid in an envelope addressed to Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA. 22202-3513

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*SA*