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Attorney Ref.: 200980 GDK/dh

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

\_\_\_\_\_  
Terra Networks, S.A. )  
) )  
Opposer, )  
) )  
v. )  
) )  
Nippon Denki Kabushiki Kaisha, )  
d/b/a NEC Corporation, )  
) )  
Applicant. )  
\_\_\_\_\_

Opposition No. 91/152,718



09-27-2002

U.S. Patent & TMO/TM Mail Rcpt Dt. #61

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TRADEMARK TRIAL AND APPEAL BOARD

Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, VA 22202-3513

**APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

Applicant, by its attorney, hereby responds to the allegations set forth in the Notice of Opposition as follows:

1. Applicant admits the allegations set forth in Numbered Paragraph 1 of the Notice of Opposition.
2. Applicant admits the allegations set forth in Numbered Paragraph 2 of the Notice of Opposition.
3. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 3 of the Notice of Opposition and, therefore, Applicant denies said allegations.
4. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 4 of the Notice of Opposition and, therefore, Applicant denies said allegations.

*[Handwritten signature]*

5. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 5 of the Notice of Opposition and, therefore, Applicant denies said allegations.

6. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 6 of the Notice of Opposition and, therefore, Applicant denies said allegations.

7. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 7 of the Notice of Opposition and, therefore, Applicant denies said allegations.

8. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 8 of the Notice of Opposition and, therefore, Applicant denies said allegations.

9. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 9 of the Notice of Opposition and, therefore, Applicant denies said allegations.

10. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 10 of the Notice of Opposition and, therefore, Applicant denies said allegations.

11. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in the first sentence of Numbered Paragraph 11 of the Notice of Opposition and, therefore, Applicant denies said allegations. Applicant otherwise denies the allegations in Numbered Paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations set forth in Numbered Paragraph 12 of the Notice of Opposition.

13. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 13 of the Notice of Opposition and, therefore, Applicant denies said allegations.

14. Applicant denies the allegations set forth in Numbered Paragraph 14 of the Notice of Opposition.

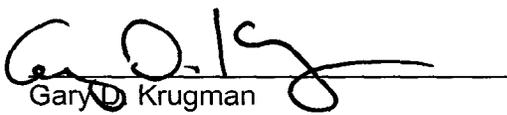
15. Applicant denies the allegations set forth in Numbered Paragraph 15 of the Notice of Opposition.

16. Applicant denies the allegations set forth in Numbered Paragraph 16 of the Notice of Opposition.

WHEREFORE, Applicant respectfully requests that the opposition be dismissed with prejudice.

Respectfully submitted,

Nippon Denki Kabushiki Kaisha,  
d/b/a NEC Corporation,

By:   
Gary D. Krugman  
Attorney for Applicant  
SUGHRUE MION, PLLC  
2100 Pennsylvania Avenue, N.W.  
Washington, DC 20037-3202  
Telephone: (202) 663-7484  
Facsimile: (202) 293-7860

Date: September 27, 2002

**CERTIFICATE OF SERVICE**

I, Gary D. Krugman, hereby certify that on this 27<sup>th</sup> day of September 2002, a true copy of the foregoing **Applicant's Answers to Notice of Opposition** was sent, via facsimile and first class mail, postage pre-paid to:

Mark I. Peroff  
Keith E. Danish  
Trademark and Patent Counselors of America, P.C.  
915 Broadway  
19<sup>th</sup> Floor  
New York, New York 10010-7108

Attorneys for Opposer

  
Gary D. Krugman

**PLEASE DATE STAMP AND RETURN TO USE – BOX 235X**

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Papers filed:

**APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

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4. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 4 of the Notice of Opposition and, therefore, Applicant denies said allegations.

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6. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 6 of the Notice of Opposition and, therefore, Applicant denies said allegations.

7. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 7 of the Notice of Opposition and, therefore, Applicant denies said allegations.

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10. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in Numbered Paragraph 10 of the Notice of Opposition and, therefore, Applicant denies said allegations.

11. Applicant has insufficient knowledge or information upon which to form a belief as to the truth of the allegations set forth in the first sentence of Numbered Paragraph 11 of the Notice of Opposition and, therefore, Applicant denies said allegations. Applicant otherwise denies the allegations in Numbered Paragraph 11 of the Notice of Opposition.

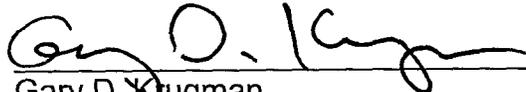
12. Applicant denies the allegations set forth in Numbered Paragraph 12 of the Notice of Opposition.

**CERTIFICATE OF SERVICE**

I, Gary D. Krugman, hereby certify that on this 27<sup>th</sup> day of September 2002, a true copy of the foregoing **Applicant's Answers to Notice of Opposition** was sent, via facsimile and first class mail, postage pre-paid to:

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Attorneys for Opposer

  
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Gary D. Krugman