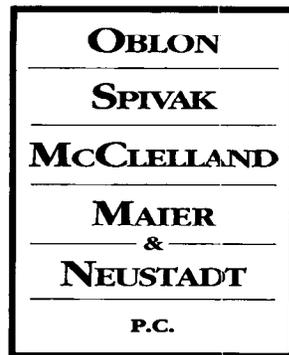




TTAB

April 21, 2005



Honorable Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

ATTORNEYS AT LAW
DAVID J. KERA
(703) 412-6456
DKERA@OBLON.COM

Re: Toyota Jidosha Kabushiki Kaisha, t/a Toyota Motor Corporation and
Toyota Motor Sales, U.S.A., Inc. v. Syngenta Participations AG
Matter: LEXUS v. LEXUS and LEXXUS
Opposition No.: 91/157,206
Class(es): 5
Atty Dkt. No.: 238096US-213-21

Dear Commissioner:

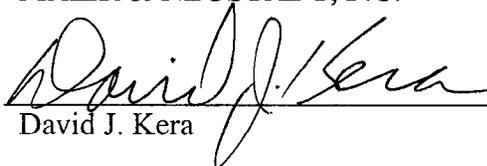
We enclose the following for filing in the U.S. Patent and Trademark Office:

- Opposers' Response to Applicant's Motion for Protective Order for Opposition No. 91/157,206

Please note: All electronic correspondence relating to this matter should be sent to tmDocket@oblon.com.

Respectfully submitted,

OBLON, SPIVAK, MCCLELLAND,
MAIER & NEUSTADT, P.C.



David J. Kera

DJK/ojb {I:\atty\Djk\213-238096US-cov.doc}

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

| | | |
|-----------------------------------|---|--|
| Toyota Jidosha Kabushiki Kaisha, |) | |
| t/a Toyota Motor Corporation, |) | |
| and |) | |
| Toyota Motor Sales, U.S.A., Inc., |) | |
| |) | |
| Opposers |) | |
| |) | |
| v. |) | |
| |) | |
| Syngenta Participations AG, |) | |
| |) | |
| Applicant |) | |
| |) | |

CONSOLIDATED

Opposition No.: 157,206
Mark: LEXUS
U. S. Appln. Serial No.: 78/145,546

Opposition No.: 159,578
Mark: LEXXUS
U. S. Appln. Serial No.: 78/185,538

OPPOSERS' RESPONSE TO APPLICANT'S MOTION FOR PROTECTIVE ORDER

Opposers, Toyota Jidosha Kabushiki Kaisha t/a Toyota Motor Corporation and Toyota Motor Sales, U.S.A., Inc., reaffirm their previous arguments in support of entry of a protective order previously submitted to the Board. Opposers object to what the Board agrees is the inclusion of unnecessary language in Applicant's proposed protective order.

Accordingly, Applicant's Motion for Protective Order should be denied.

Respectfully submitted,

Toyota Jidosha Kabushiki Kaisha,
t/a Toyota Motor Corporation and
Toyota Motor Sales, U.S.A., Inc.

By:



David J. Kera
Amy Sullivan Cahill
Oblon, Spivak, McClelland,
Maier, & Neustadt, P.C.
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Alexandria, Virginia 22314
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Fax: (703) 413-2220
Attorneys for Opposers

Date:

April 21, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **OPPOSERS' RESPONSE TO APPLICANT'S MOTION FOR PROTECTIVE ORDER** was served on counsel for Applicant, this 21st day of April, 2005, by sending via First Class mail, postage prepaid to,

James A. Zellinger, Esquire
SYNGENTA CROP PROTECTION INC.
410 Swing Road
Greensboro, North Carolina 27409

D. Jean Barrett