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

Proceeding	91161002
Party	Plaintiff Microsoft Corporation ,
Correspondence Address	William O. Ferron, Jr. SEED Intellectual Property Law Group 701 Fifth Avenue, Suite 6300 Seattle, WA 98104-7092 billf@seedlaw.com
Submission	Declaration of William O. Ferron, Jr. In Support of Motion for Default for Failure to Answer
Filer's Name	William O. Ferron, Jr.
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Signature	/WOF/
Date	05/03/2005
Attachments	SP-DecWOFSupportMotDefault.PDF (4 pages)

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

MICROSOFT CORPORATION,)	
)	OPPOSITION NO. 91/161,002
Opposer,)	
)	Serial No. 76/310,036
v.)	
)	
SOFTCAMP CO. LTD.,)	
)	Docket No. 663005.80455
Applicant.)	
_____)		

**DECLARATION OF WILLIAM O. FERRON, JR. IN SUPPORT OF
OPPOSER MICROSOFT CORPORATION'S MOTION FOR ENTRY
OF DEFAULT JUDGMENT AGAINST APPLICANT FOR FAILURE
TO ANSWER**

I, WILLIAM O. FERRON, JR., hereby declare and state that:

1. I am a principal of the Seed Intellectual Property Law Group PLLC and lead counsel for Opposer Microsoft Corporation ("Opposer") in this proceeding. The following facts are true of my own knowledge unless otherwise stated.

2. Opposer timely filed its Notice of Opposition to Application 76/310,036 for the mark UNIWORK, and on June 23, 2004 the Board issued a Scheduling Order giving the Applicant until August 2, 2004 to file an Answer to the Notice of Opposition.

3. On July 6, 2004, Applicant's counsel of record Douglas Chaikin of the Peninsula IP Group, a "Notice of Non-Counsel of Record," which the Board subsequently found to be improper. *See* Order of Sept. 27, 2004 at ¶ 1. At no point did Mr. Chaikin, or any other representative of the Applicant contact counsel for Opposer Microsoft to request an extension of time in which to file an Answer.

4. On September 27, 2004, the Board issued an Order detailing the deficiencies in the "Notice of Non-Counsel of Record," giving Applicant's counsel thirty (30) days to submit a proper request to withdraw, and suspending the Opposition. The Order further indicated that "appropriate dates will be rescheduled in due course."

5. On October 8, 2004, Douglas Chaikin of the Peninsula IP Group submitted a "Notice of Withdrawal of Attorney for Applicant," which the Board again found deficient in an Order dated January 13, 2005. Proceedings remained suspended, and the Board gave Mr. Chaikin an additional thirty (30) days to submit a Motion to Withdraw which complied with Trademark Rule 2.19(b).

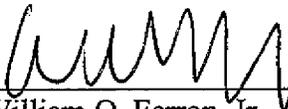
6. On April 25, 2005, having received no corrected Motion to Withdraw or appearance of new counsel on behalf of Applicant, the Board resumed proceedings, and reset the trial schedule, beginning with the close of discovery on July 24, 2005.

7. No Answer has been filed and Applicant has not contacted Opposer directly or through any counsel or agent to seek an extension of time to Answer.

8. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. I further declare that all statements made herein are made with the knowledge that the making of willfully false statements and the like is punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United

State Code, and may jeopardize the validity of the application or document or any registration resulting therefrom.

Executed this 3rd day of May, 2005.



William O. Ferron, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 3RD day of May, 2005 the foregoing **DECLARATION OF WILLIAM O. FERRON, JR. IN SUPPORT OF OPPOSER MICROSOFT CORPORATION'S MOTION FOR ENTRY OF JUDGMENT AGAINST APPLICANT FOR FAILURE TO ANSWER** was served upon Applicant's Domestic Representative by depositing same with the U.S. Postal Service, first-class postage prepaid, addressed as follows:

Douglas A. Chaikin
Peninsula IP Group
2290 N. 1st St., Suite 101
San Jose, CA 95131

And upon Applicant at its corporate offices in the Republic of Korea via courier, addressed as follows:

Hwa-Ja Park, President
Softcamp Co. Ltd.
9th Floor, Kusan Tower
3250 Pangbae-2Dong
Seocho-gu
Seoul, Republic of Korea



Ross Merritt