



• MEDIMET	894,355
• METDESK	2,712,168
• MET DISABILITY	2, 034,965
• METEDGE	2, 263,363
• MET-ELECT	1,433, 231
• METFLEX	2,094,829
• METFLEX C	2,809,158
• METLAW	2,765,792
• METLIFE	1,541,862
• METLINK	1,908,285
• METNET	2,243,916
• METPAY	2,206,512
• MET P&C	2,076,720
• MET PREMIER	2,858,109
• MET-REVIEW	1,433,232
• METSELECT	2,826,631
• METSELECT ALLIANCE	2,212,076
• METSMART	2,739,108
• VESTMET	1,811,094

3. Since its initial use of the MET mark, MetLife has made a substantial investment in advertising and promoting the services under its trademark. MetLife has extensively used, advertised, promoted and offered MetLife's services bearing the mark to the public through various channels of trade in commerce, with the result that MetLife's customers and the public in general have come to know and recognize MetLife's mark and associate same with MetLife and services sold by MetLife. MetLife has built extensive good will in connection with the sale of services under its mark.
4. Upon information and belief, notwithstanding MetLife's rights in and to its mark, and family of marks, Applicant filed applications for registration for METGIRLS and METART.
5. Applicant's marks are a simulation and colorable imitation of, and so resemble MetLife's mark and family of marks, as to be likely to cause confusion or mistake or to deceive consumers resulting in damage and detriment to MetLife and its reputation, particularly since Applicant's marks are related to adult entertainment services.
6. MetLife, upon information and belief, avers that its customers, and the public in general are likely to be confused, mistaken or deceived as to the origin and sponsorship of Applicant's proposed services to be marketed under Applicant's METGIRLS and METART trademarks and mislead into believing that such services are offered by, emanate from, or are in some way directly or indirectly associated with MetLife, to the damage and detriment of MetLife and its reputation.
7. MetLife, upon information and belief, avers that it will be damaged by the registration of Applicant's marks, METGIRLS and METART in that the marks

are substantially similar to MetLife's mark, family of marks and common law rights.

WHEREFORE, MetLife believes and avers that it is being and will continue to be damaged by the registration of METGIRLS and METART trademarks and prays that said applications be rejected, that no registrations be issued thereupon to Applicant, and that this opposition be sustained in favor of MetLife.

Please address correspondence and telephone inquiries to:

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The Commissioner is hereby authorized to charge the filing fee, in the amount of \$600.00, for this opposition to PTO Deposit Account No. 13-2987. The Commissioner is further authorized to charge any additional fees which may be required, or credit any overpayment to PTO Deposit Account No. 13-2987.

Respectfully submitted,

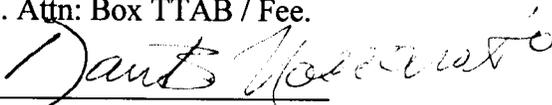
By:   
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**CERTIFICATE OF EXPRESS MAILING UNDER 37 CFR 1.10**

"Express Mail" mailing label number: ED 251121034 US

Date of Deposit: October 27, 2004

I hereby certify that this Notice of Opposition is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" Service under 37 CFR 1.10 on the date indicated above and is addressed to the Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513. Attn: Box TTAB / Fee.

By:   
Dante Naccarato