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August 29, 2005

TTAB

VIA HAND DELIVERY

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

ATTN: BOX TTAB FEE

Re: INTERSECTIONS INC. V. IDENTITY THEFT GUARD SOLUTIONS, LLC
Mark: IDENTITY SAFEGUARDS – SERIAL NO. 78/286,737
OPPOSITION NO.: TO BE ADVISED
Our Reference No.: 27993-215899

Sir:

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

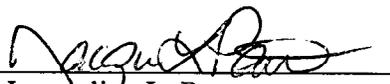
1. Notice of Opposition in duplicate

Authorization is granted to deduct the \$900.00 filing fee, and any other fees, from Deposit Account No. 22-0261.

Please send all correspondence in connection with this matter to the undersigned's attention.

Respectfully submitted,

By: _____


Jacqueline L. Patt
Attorney for Applicant

Enclosure: As Stated
JLP/bmh
608935v1(110)



08-29-2005
U.S. Patent & TMO/c/TM Mail Rcpt Dt. #72

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

INTERSECTIONS INC.)
)
 Opposer,)
)
 v.)
)
 IDENTITY THEFT GUARD SOLUTIONS, LLC)
)
 Applicant.)
 _____)

Opposition No. _____
Serial No. 78/286,737
Mark: IDENTITY SAFEGUARDS

Attorney's Reference: 27993-215899

NOTICE OF OPPOSITION

In the matter of the application for registration of the trademark IDENTITY SAFEGUARDS filed by Identity Theft Guard Solutions, LLC ("Applicant"), as shown in Application Serial No. 78/286,737 published for opposition in the *Official Gazette* of March 1, 2005.

Intersections, Inc. ("Opposer"), a Delaware corporation with its address at 14901 Bogle Drive, Chantilly, Virginia 20151, believes that it will be damaged by registration of the mark shown in said Application Serial No. 78/286,737 in Classes 35, 36 and 45, and hereby opposes the same:

As grounds for opposition it is alleged that:

1. Opposer is now, and for many years has provided goods and services that assist consumers with credit management, credit monitoring, identity theft protection, identity theft insurance, credit education, fraud resolution assistance, credit card registration services and credit card cancellation and credit card monitoring services.

2. Opposer is the owner of U.S. Registration No. 2,689,654 issued February 25, 2003 for the mark IDENTITY GUARD covering "credit card registration services" in International Class 35 and "credit card cancellation services for lost or stolen cards; credit card monitoring services for lost or stolen cards" in International Class 36.
3. Opposer has used the trademark IDENTITY GUARD in the United States in connection with its goods and services since prior to any date of first use that may be relied upon by the Applicant.
4. On information and belief, Applicant did not use the trademark IDENTITY SAFEGUARDS in the United States for the services described in its application prior to any first use date that can be relied upon by Opposer.
5. The services for which Applicant seeks to register the mark IDENTITY SAFEGUARDS are related to goods and services offered by Opposer under its mark IDENTITY GUARD.
6. Applicant's services intended to be offered under the mark IDENTITY SAFEGUARDS travel in the same channels of trade and are offered to the same consumers as Opposer's goods and services offered under the mark IDENTITY GUARD.
7. The mark IDENTITY SAFEGUARDS is so similar to Opposer's Mark IDENTITY GUARD that Applicant's use and registration of its trademark to identify its services is likely to cause confusion and lead to deception as to the source of origin and/or the sponsorship of Applicant's services and/or Opposer's goods and services.

8. If the Applicant were permitted to use and register its mark for its services, confusion among consumers resulting in damage and injury to Opposer would be caused by virtue of the similarity between Applicant's trademark and Opposer's trademark, and the related nature of the goods and services covered by those marks. Any defect, objection or fault found with Applicant's services would reflect upon, seriously injure, and dilute the reputation and value that Opposer has established under its trademark.

WHEREFORE, Opposer prays that Application Serial No. 78/286,737 be rejected, that no registration be issued thereon to Applicant, and that this opposition be sustained in favor of the Opposer.

This Notice of Opposition is submitted in duplicate. Please deduct the statutory filing fee of \$900.00 (Classes 35, 36 and 45) and any additional fees be from deposit Account No. 22-0261 and notify the undersigned accordingly.

Opposer appoints Mark B. Harrison, Marcia A. Auberger, Janet Satterthwaite, Andrew Price and Jacqueline Patt, along with the law firm of Venable LLP, P.O. Box 34385, Washington, D.C. 20043-9998 to transact all business on its behalf in connection with this Opposition.

Respectfully submitted,

By:  _____

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Date: August 29, 2005

Attorneys for Opposer