



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

In the matter of Application Serial No. 78/457751  
Filed on July 28<sup>th</sup>, 2000  
Published in the Official Angela Lykos of January 23<sup>rd</sup>, 2006

TTAB

DAX Technologies Corporation

V.

Groundhog Technologies Inc.

Opposition No.: 91167256

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Now comes Applicant, Groundhog Technologies Corporation ("Applicant") by directly the Chairman of the Applicant, for the response to the Letter that USPTO sent to us dated January 23<sup>rd</sup>, 2006. We are stating the following 4 points to USPTO and the allegations in Opposer, DAX Technologies ("Opposer").

1. We did not receive the letter that USPTO required us on answering the opposition as stated in the document "ttabvue-91167256-OPP-2.pdf" which is dated of Nov. 2<sup>nd</sup> and posted on USPTO website. Therefore, we would like to appeal for extension as stated in USPTO's letter to us.
2. Trademarks of Applicant and Opposer, "OptiMo GSM/GPRS" and "Optima" respectively, are quite different.
3. In the U. S. wireless industry, there is a company called "Optimi" who is a direct competitor of the Opposer.
4. The Applicant's OptiMo GSM/GPRS products are not for RF planning, as what Opposer is doing.

Dated: 15<sup>th</sup> Feb. 2006

Respectfully submitted,

Dated: 15<sup>th</sup> Feb. 2006

By:   
Ta-gang Chioi  
Chairman, Groundhog Technologies Inc.



02-16-2006

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

<b>Proceeding</b>	91167256
<b>Party</b>	Defendant Groundhog Technologies Corporation
<b>Correspondence Address</b>	Ta-gang Chiou One Broadway, 14 <sup>th</sup> Floor Cambridge, MA 02142
<b>Submission</b>	Answer
<b>Filer's Name</b>	Ta-gang Chiou
<b>Filer's e-mail</b>	<a href="mailto:david@ghtinc.com">david@ghtinc.com</a>
<b>Signature</b>	/Ta-gang Chiou/
<b>Date</b>	02/15/2006
<b>Attachments</b>	Answer to Notice of Opp.pdf (1 page)