

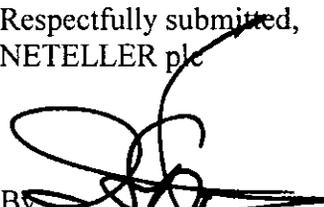
At the time of receipt of Notice of Opposition, Applicant's Canadian counsel had been away from his office for an extended period of time, returning only on September 4, 2006. Applicant's Canadian counsel thereupon became preoccupied with other pressing matters, including in particular a trademark opposition appeal that is pending in the Canada Federal Court, on which a hearing requiring his attendance was held on September 13, 2006.

Upon realizing that the oversight had occurred, Applicant's Canadian and United States counsel acted diligently to correct it, through prompt discussions and correspondence between them and with Opposer's counsel. Moreover, the delay in submitting Applicant's Answer is believed to have caused no prejudice whatsoever.

The intention of Applicant to seek to reopen the period for filing of the instant answer was discussed by Applicant's Canadian and United States counsel with counsel for Opposer. While indicating a disinclination to agree (finally refusing on September 22, 2006), counsel for Opposer could, upon inquiry, state no reason why any prejudice would or might result to her client as a result of the grant of the instant Motion.

It is respectfully submitted that the ends of justice require grant of the instant motion, and such action is earnestly solicited.

Respectfully submitted,
NETELLER plc

By 

Ira S. Dorman
Attorney for Applicant
330 Roberts Street, Suite 200
East Hartford, Connecticut 06108
Tel.: (860) 528-0772

September 25, 2006

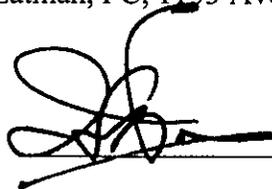
CERTIFICATE OF MAILING

I, IRA S. DORMAN, hereby certify that a copy of this Motion To Reopen is being deposited with the United States Postal Service with sufficient postage as First Class mail in an envelope addressed to Commissioner for Trademarks, Trademark Trial and Appeal Board, P.O. Box 1451, Alexandria, Virginia 22313-1451, on this 25th day of September, 2006.



CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion To Reopen has been sent this 25th day of September, 2006 with sufficient postage as First Class mail, in an envelope addressed to Sujata Chaudhri, Esq., Cowan, Liebowitz & Latman, PC, 1133 Avenue of the Americas, New York, New York 10036.



cc: Neil F. Kathol, Esq.