

ESTTA Tracking number: **ESTTA328827**

Filing date: **01/26/2010**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	Zoran Corporation
Granted to Date of previous extension	01/27/2010
Address	1390 Kifer Road Sunnyvale, CA 94086 UNITED STATES

Attorney information	K. Alison de Runtz Davis Wright Tremaine LLP 505 Montgomery Street, Suite 800 San Francisco, CA 94111 UNITED STATES alisonderuntz@dwt.com, judywilson@dwt.com Phone:415 276-6500
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**Applicant Information**

Application No	77607782	Publication date	09/29/2009
Opposition Filing Date	01/26/2010	Opposition Period Ends	01/27/2010
Applicants	Huante, Xavier 575 East 238th Place Carson, CA 90745 UNITED STATES  Huante, Gabriel 575 East 238th Place Carson, CA 90745 UNITED STATES		

**Goods/Services Affected by Opposition**

Class 009. All goods and services in the class are opposed, namely: Televisions, liquid crystal display televisions, plasma televisions, remote control units for television receivers, television monitors with or without television tuners, television accessories, namely, component cables and DVI-I cables
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**Grounds for Opposition**

Priority and likelihood of confusion	Trademark Act section 2(d)
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**Marks Cited by Opposer as Basis for Opposition**

U.S. Registration No.	2394130	Application Date	10/22/1998
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Registration Date	10/10/2000	Foreign Priority Date	NONE
Word Mark	SUPRAAV		
Design Mark	<b>SUPRAAV</b>		
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1999/08/23 First Use In Commerce: 1999/08/23 INTEGRATED CIRCUITS FOR VIDEO AND AUDIO DECODING		

U.S. Registration No.	2789850	Application Date	07/19/2002
Registration Date	12/02/2003	Foreign Priority Date	NONE
Word Mark	SUPRATV		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2003/08/20 First Use In Commerce: 2003/08/20 Integrated Circuits		

U.S. Registration No.	3529042	Application Date	10/29/2004
Registration Date	11/04/2008	Foreign Priority Date	NONE
Word Mark	SUPRAHD		
Design Mark	<b>SUPRAHD</b>		
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2005/05/09 First Use In Commerce: 2005/05/09 Integrated circuits		

U.S. Registration No.	3705800	Application Date	05/11/2007
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Registration Date	11/03/2009	Foreign Priority Date	NONE
Word Mark	SUPRAXD		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2009/04/15 First Use In Commerce: 2009/04/15 integrated circuit; microprocessor		

U.S. Application No.	77179180	Application Date	05/11/2007
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	SUPRAFE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: Demodulator; audio-video signal tuner; integrated circuit containing demodulator and microprocessor; integrated circuit containing audio-video signal tuner and microprocessor; integrated circuit containing demodulator, audio-video signal tuner and microprocessor; module containing demodulator and integrated circuit; module containing demodulator and microprocessor; module containing demodulator, integrated circuit, and microprocessor; module containing audio-video signal tuner and integrated circuit; module containing audio-video signal tuner and microprocessor; module containing audio-video signal tuner, integrated circuit, and microprocessor; module containing demodulator, audio-video signal tuner and integrated circuit; module containing demodulator, audio-video signal tuner and microprocessor; module containing demodulator, audio-video signal tuner, integrated circuit, and microprocessor		

Attachments	75576760#TMSN.gif ( 1 page )( bytes ) 78508700#TMSN.jpeg ( 1 page )( bytes ) 77179322#TMSN.jpeg ( 1 page )( bytes ) 77179180#TMSN.jpeg ( 1 page )( bytes ) ZRAN.130XX0 Notice of Opposition 1-26-10.pdf ( 8 pages )(233613 bytes )
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## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/K. Alison de Runtz/
Name	K. Alison de Runtz
Date	01/26/2010

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

In re United States Trademark

Application No. 77/607,782

For Intended Mark: SUPRA

File Date: November 5, 2008

Official Gazette Publication date: September 9, 2009

Zoran Corporation,	)	OPPOSITION NO.
Opposer,	)	
v.	)	
Xavier Huante and Gabriel Huante,	)	
Applicants.	)	
_____	)	

BOX TTAB/FEE  
Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

Commissioner:

**NOTICE OF OPPOSITION**

Opposer, Zoran Corporation, believes that it would be damaged by registration of SUPRA, as presented in U.S. Trademark Application No. 77/607,782, by Applicants, Xavier Huante and Gabriel Huante, and therefore hereby gives Notice of Opposition to such registration and asks the Commissioner to refuse the aforementioned application and such registration.

The grounds for this opposition are set forth below.

1. Opposer, Zoran Corporation, is a corporation organized under the laws of Delaware, U.S.A., having its principal office at 1390 Kifer Road, Sunnyvale, California 94086, U.S.A.

2. Upon information and belief, Applicants, Xavier Huante and Gabriel Huante of Carson, California, filed an intent-to-use application on November 5, 2008, seeking to register SUPRA as a trademark on the Principal Register.

3. Upon information and belief, the United States Patent and Trademark Office assigned the aforementioned intent-to-use application U.S. Trademark Application No. 77/607,782, which it published for opposition on September 9, 2009.

4. Upon information and belief, the aforementioned intent-to-use application, as published, recites goods in International Class 9 as “Televisions, liquid crystal display televisions, plasma televisions, remote control units for television receivers, television monitors with or without television tuners, television accessories, namely, component cables and DVI-I cables” (hereinafter, “Applicants’ Goods”).

5. Upon information and belief, neither Applicants have made nor any predecessor in interest of Applicants has made use of the designation SUPRA as a trademark prior to November 5, 2008, the filing date of Applicants’ intent-to-use application.

6. Opposer filed extensions of time to oppose, which were granted by the United States Patent and Trademark Office, such that Opposer was given until January 27, 2010 to oppose.

7. Prior to and since November 5, 2008, the filing date of Applicants’ intent-to-use application, Opposer has continuously engaged in the sale in commerce of a variety of electronic, media-related, and documentary goods, including software, firmware, and microcode, for a variety of applications, including multimedia applications, facilitating compression, decompression, decoding, processing, production, and transmission of media

signals, such as audio and video signals, and facilitating recording and networking applications; printed circuit boards, printed circuit board components, and printed circuit board assemblies; data storage media and design documentation, including some containing information for use in connection with an integrated circuit; semiconductors, integrated circuits, microprocessors, and controllers, including some embedded with the aforementioned software, firmware, and microcode; controllers, including controllers having a central processing unit core, a digital signal processing core, and embedded or downloadable software associated with the aforementioned cores; image processors; digital signal processors; demodulators; audio-video signal tuners; modules containing the aforementioned goods; design documentation associated with the aforesaid modules; and the foregoing goods for use in or as part of electronic devices for media, multimedia, and digital entertainment applications, including those for controlling DVD playback, DVD recording, DVD audio, set-top boxes, televisions, digital cameras, camera phones, printers, and wireless connections to computers (hereinafter, "Opposer's Goods").

8. Since at least as early as August 23, 1999, Opposer has adopted and continuously used one or more of a number or family of SUPRA-based trademarks in commerce in connection with a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above. This family has included at least SUPRAAV, SUPRATV, SUPRAHD, SUPRAXD and SUPRAFE trademarks.

9. Prior to and since November 5, 2008, Opposer has applied for and prosecuted, and continues to own and maintain one or more of a number or family of U.S. applications for trademark registration and trademark registrations for one or more of a number or family of SUPRA-based trademarks used in connection with a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above. This family has included at least United States Trademark Registration No.

2,394,130 for SUPRAAV; United States Trademark Registration No. 2,789,850 for SUPRATV; United States Trademark Registration No. 3,529,042 for SUPRAHD; United States Trademark Registration No. 3,705,800 for SUPRAXD; and United States Trademark Application No. 77/179,180 for SUPRAFE, the first of the aforementioned registrations associated with a constructive use date of October 22, 1998.

10. Opposer owns and continues to maintain United States Trademark Registration No. 2,789,850, having a constructive use date of July 19, 2002, for the trademark SUPRATV for integrated circuits in International Class 9. This registration is incontestable.

11. Opposer owns and continues to maintain United States Trademark Registration No. 3,529,042, having a constructive use date of October 29, 2004, for the trademark SUPRAHD for integrated circuits in International Class 9.

12. Opposer owns and continues to maintain United States Trademark Registration No. 3,705,800, having a constructive use date of May 11, 2007, for the trademark SUPRAXD for integrated circuit; microprocessor in International Class 9.

13. Opposer owns and continues to prosecute United States Trademark Application No. 77/179,180, filed on May 11, 2007, for the trademark SUPRAFE, which application has been allowed. The aforementioned application, as allowed, recites goods as follows: Demodulator; audio-video signal tuner; integrated circuit containing demodulator and microprocessor; integrated circuit containing audio-video signal tuner and microprocessor; integrated circuit containing demodulator, audio-video signal tuner and microprocessor; module containing demodulator and integrated circuit; module containing demodulator and microprocessor; module containing demodulator, integrated circuit, and microprocessor; module containing audio-video signal tuner and integrated circuit; module containing audio-video signal tuner and microprocessor; module containing audio-video

signal tuner, integrated circuit, and microprocessor; module containing demodulator, audio-video signal tuner and integrated circuit; module containing demodulator, audio-video signal tuner and microprocessor; module containing demodulator, audio-video signal tuner, integrated circuit, and microprocessor in International Class 9.

14. Opposer has adopted and used one or more of a number or family of SUPRA-based trademarks, and has owned and prosecuted one or more US applications for trademark registration and trademark registrations for same, as set forth in items 8-13 above. Opposer continues to adopt, and to prosecute U.S. applications for trademark registration for, SUPRA-based trademarks it intends to use in commerce in connection with a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above. Opposer intends to and continues to add to its family of SUPRA-based trademarks for use in commerce in connection with a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above.

15. Since its initial adoption and use of its family of SUPRA-based trademarks, as described above, Opposer has transacted a substantial amount of commercial trade in a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above, under its family of SUPRA-based trademarks and has expended substantial sums of money, time and effort in advertising, promoting and popularizing its family of SUPRA-based trademarks, and the SUPRA-based trademarks therein, extensively in the United States. As a result of Opposer's use of its family of SUPRA-based trademarks in commerce, this family of SUPRA-based trademarks and the SUPRA-based trademarks therein are well known in the United States and are recognized as identifying the high-quality of a variety of electronic, media-related, and documentary goods, including Opposer's Goods described in item 7 above, of Opposer. Therefore, Opposer has

reason to consider its family of SUPRA-based trademarks, the SUPRA-based trademarks therein, and the goodwill associated therewith valuable assets.

16. The Opposer's Goods and Applicants' Goods, as described in item 4 and item 7 above, respectively, are identical or so closely related that if the same or similar trademarks, or trademarks so resembling one another, are used in connection with these respective goods, it is likely to result in confusion, mistake, or deception.

17. SUPRA so resembles any one or all of the SUPRA-based trademarks in Opposer's family of SUPRA-based trademarks, including at least the SUPRATV, SUPRAHD, SUPRAXD and SUPRAFE trademarks, as to be likely, when used on or in connection with Applicants' Goods, as described in item 4 above, to cause confusion of, mistake by, or deception of those in the relevant public, including those in the trade or the purchasing public, as to source, affiliation, connection, or sponsorship.

18. SUPRA so resembles any one or all of the SUPRA-based trademarks in Opposer's family of SUPRA-based trademarks, including at least the SUPRATV, SUPRAHD, SUPRAXD and SUPRAFE trademarks, as to be likely, when used on or in connection with Applicants' Goods, as described in item 4 above, to cause confusion, to cause mistake, or to deceive.

19. By reason of all of the foregoing, Opposer would be greatly damaged by the registration of SUPRA.

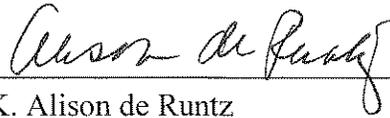
WHEREFOR, Opposer prays that this Opposition be sustained and that U.S. Trademark Application No. 77/607,782 and registration of SUPRA therein be refused.

Opposer herewith submits this Notice of Opposition along with the requisite filing fee in the amount of three hundred dollars (\$300) for each class opposed. Please charge any additional fees or credit any excess to our Deposit Account No. 04-0258.

Please direct all communications to K. Alison de Runtz of Davis Wright  
Tremaine, LLP, 505 Montgomery Street, Suite 800, San Francisco, California 94111-6533.

Dated this 26th day of January, 2010.

Respectfully submitted,  
Zoran Corporation  
DAVIS WRIGHT TREMAINE, LLP



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K. Alison de Runtz  
Attorneys for Opposer

505 Montgomery Street  
Suite 800  
San Francisco, CA 94111-6533  
Tel: (415) 276-6500  
Fax: (415) 276-6599  
Email: [alisonderuntz@dwt.com](mailto:alisonderuntz@dwt.com)

ADR:jw

Enclosure:

Certificate of Service

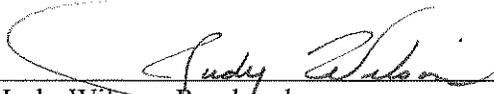
cc: Zoran Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **NOTICE OF OPPOSITION** was served on January 26, 2010, via United States first-class mail, postage prepaid, in an envelope addressed to:

Christopher J. Day  
Law Office of Christopher Day  
301 E. Bethany Home Road, Suite A213  
Phoenix, AZ 85012-1287  
United States of America  
Attorney for Applicants

1/26/10

  
\_\_\_\_\_  
Judy Wilson, Paralegal  
Davis Wright Tremaine LLP