

ESTTA Tracking number: **ESTTA365861**

Filing date: **08/30/2010**

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	Connect Public Relations, Inc.
Granted to Date of previous extension	08/29/2010
Address	80 East 100 North Provo, UT 84606 UNITED STATES

Attorney information	Karl R. Cannon CLAYTON, HOWARTH & CANNON, P.C. P.O. Box 1909 Sandy, UT 84091 UNITED STATES kcannon@chcpat.com, ttetzl@chcpat.com, docketclerk@chcpat.com, bdavis@chcpat.com Phone:801-255-5335
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**Applicant Information**

Application No	77714693	Publication date	03/02/2010
Opposition Filing Date	08/30/2010	Opposition Period Ends	08/29/2010
Applicant	Digitalmojo, Inc. 8344 Clairemont Mesa Blvd., Suite 100 San Diego, CA 92111 UNITED STATES		

**Goods/Services Affected by Opposition**

<p>Class 009. All goods and services in the class are opposed, namely: audio recordings featuring music; video recordings featuring music; downloadable audio and video recordings featuring music; prerecorded music on CD, DVD and other media</p>
<p>Class 035. All goods and services in the class are opposed, namely: Business marketing services in the nature of agency representation of companies marketing a variety of services to home owners and renters, namely, utility hook-ups, telecommunication services, home security services, home warranties, home and yard maintenance, furniture and appliance rental; comparative marketing and advertising services for providers of residential and business telecommunications services, namely, for providers of broadband cable, DSL, fiber-optic and satellite Internet access services, cable and satellite television, voice over IP, and long-distance telephone services; operation of telephone call centers for others; marketing of high speed telephone, Internet, and wireless access, and directing consumers to access providers; providing an online directory information service featuring information regarding, and in the nature of, classifieds; advertising and information distribution services, namely, providing classified advertising space via the global computer network; promoting the goods and services of others over the Internet; providing online computer databases and on-line searchable databases</p>

featuring classified listings and want ads; online business networking services; providing telephone directory information via global communications networks; providing an online interactive website obtaining users comments concerning business organizations, service providers, and other resources; providing information, namely, compilations, rankings, ratings, reviews, referrals and recommendations relating to business organizations, service providers, and other resources using a global computer network; providing telephone directory information via global communications networks; arranging for others the initiation and termination of telecommunication services and utility services in the nature of water, gas and electricity and consultation rendered in connection therewith

Class 038.

All goods and services in the class are opposed, namely: providing online chat rooms for registered users for transmission of messages concerning classifieds, virtual community and social networking; providing on-line chat rooms and electronic bulletin boards for transmission of messages among users in the field of general interest; providing email and instant messaging services

Class 042.

All goods and services in the class are opposed, namely: computer services, namely, creating an on-line community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; computer software development; application service provider (ASP) featuring software to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; providing temporary use of non-downloadable software applications for classifieds, virtual community, social networking, photo sharing, video sharing, and transmission of photographic images; computer services, namely, hosting online web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; computer services in the nature of customized web pages featuring user-defined information, personal profiles and information

Class 045.

All goods and services in the class are opposed, namely: on-line social networking services; internet based dating, introduction and social networking services

## 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.	2362916	Application Date	03/25/1998
Registration Date	06/27/2000	Foreign Priority Date	NONE
Word Mark	CONNECT PUBLIC RELATIONS		
Design Mark	<b>CONNECT PUBLIC RELATIONS</b>		
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1998/06/00 First Use In Commerce: 1998/06/00 Printed publications, namely, reports, press kits and brochures in the fields of market research and consulting, public and media relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion material, and seminar creation and operation		

U.S. Registration No.	2373504	Application Date	03/25/1998
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Registration Date	08/01/2000	Foreign Priority Date	NONE
Word Mark	CONNECT PUBLIC RELATIONS		
Design Mark	<b>CONNECT PUBLIC RELATIONS</b>		
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 1998/05/00 First Use In Commerce: 1998/05/00 Marketing and market research and consulting services; public and media relations services and sales promotion services		

U.S. Registration No.	2373505	Application Date	03/25/1998
Registration Date	08/01/2000	Foreign Priority Date	NONE
Word Mark	CONNECT PUBLIC RELATIONS		
Design Mark	<b>CONNECT PUBLIC RELATIONS</b>		
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1998/07/00 First Use In Commerce: 1998/07/00 Prerecorded audio recordings, prerecorded video recordings, and prerecorded audio-visual recordings featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services; electronic publications featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services on computer discs and CD-ROMs		

U.S. Registration No.	2383778	Application Date	03/25/1998
Registration Date	09/05/2000	Foreign Priority Date	NONE
Word Mark	CONNECT PUBLIC RELATIONS		
Design Mark	<b>CONNECT PUBLIC RELATIONS</b>		
Description of Mark	NONE		
Goods/Services	Class 038. First use: First Use: 1999/05/00 First Use In Commerce: 1999/05/00 Communications services, namely, delivery of messages by electronic transmission		

U.S. Registration No.	2365074	Application Date	03/25/1998
Registration Date	07/04/2000	Foreign Priority Date	NONE
Word Mark	CONNECTPR		
Design Mark	<b>CONNECTPR</b>		
Description of Mark	NONE		
Goods/Services	Class 038. First use: First Use: 2000/02/00 First Use In Commerce: 2000/02/00 Communications services, namely, delivery of messages by electronic transmission		

U.S. Registration No.	2366850	Application Date	03/25/1998
Registration Date	07/11/2000	Foreign Priority Date	NONE
Word Mark	CONNECTPR		
Design Mark	<b>CONNECTPR</b>		
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 2000/02/00 First Use In Commerce: 2000/02/00 Marketing and market research and consulting services; public and media relations services and sales promotion services		

U.S. Registration No.	2383777	Application Date	03/25/1998
Registration Date	09/05/2000	Foreign Priority Date	NONE
Word Mark	CONNECTPR		
Design Mark	<b>CONNECTPR</b>		
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2000/03/00 First Use In Commerce: 2000/03/00 Prerecorded audio recordings, prerecorded video recordings, and prerecorded audio-visual recordings featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services; electronic publications featuring topics in the fields of marketing and market research and consulting services, public and media		

	relations services and sales promotion services on computer discs and CD-ROMs
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U.S. Registration No.	2713692	Application Date	03/25/1998
Registration Date	05/06/2003	Foreign Priority Date	NONE
Word Mark	CONNECTPR		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 2002/09/00 First Use In Commerce: 2002/09/00 Printed publications, namely, [ reports, press kits and ] brochures in the fields of market research and consulting, public and media relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion material, and seminar creation and operation		

U.S. Registration No.	3330353	Application Date	09/30/2002
Registration Date	11/06/2007	Foreign Priority Date	NONE
Word Mark	CONNECTPR		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 2006/01/00 First Use In Commerce: 2006/01/00 Printed publications, namely, reports, brochures and press kits comprised of brochures, flyers, and press releases, in the fields of market research and consulting, public and media relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion materials, and seminar creation and operation		

Attachments	75456522#TMSN.gif ( 1 page )( bytes ) 75456519#TMSN.gif ( 1 page )( bytes ) 75456523#TMSN.gif ( 1 page )( bytes ) 75456520#TMSN.gif ( 1 page )( bytes ) 75456495#TMSN.gif ( 1 page )( bytes ) 75456494#TMSN.gif ( 1 page )( bytes ) 75456498#TMSN.gif ( 1 page )( bytes ) Notice_of_Opposition.pdf ( 24 pages )(2759974 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	/krc/
Name	Karl R. Cannon

Date	08/30/2010
------	------------

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BRETT J. DAVIS (Registration No. 46,655)  
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Attorneys for Connect Public Relations, Inc.

**Opposed Mark: CONNECT**  
**U.S. Trademark Application Serial Number: 77/714,693**  
**Published: March 2, 2010**

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

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CONNECT PUBLIC RELATIONS, INC., a Utah corporation,	)	
	)	
Opposer	)	<b>NOTICE OF OPPOSITION</b>
	)	
v.	)	Opposition No. _____
	)	
DIGITALMOJO, INC., a California corporation,	)	
	)	
Applicant.	)	

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**NOTICE OF OPPOSITION**

As grounds for opposing U.S. Trademark Application Serial No. 77/714,693 it is alleged that:

## PARTIES

1. Connect Public Relations, Inc. is a Utah corporation having a business address of 80 East 100 North, Provo, Utah 84606 (hereinafter referred to as “Opposer” or “ConnectPR”).

2. Upon information and belief, Applicant Digitalmojo, Inc. is a California corporation with its principal place of business at 8344 Clairemont Mesa Blvd., Suite 100, San Diego, California 92111 (hereinafter referred to as “Applicant” or “Digitalmojo”).

## FACTS

3. ConnectPR is the owner of U.S. Trademark Registration No. 2,362,916, filed March 25, 1998 for the mark CONNECT PUBLIC RELATIONS used in connection with, *inter alia*, printed publications, namely, reports, press kits and brochures in the fields of market research and consulting, public and media relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion material, and seminar creation and operation.

4. ConnectPR is the owner of U.S. Trademark Registration No. 2,373,504 filed March 25, 1998 for the mark CONNECT PUBLIC RELATIONS used in connection with, *inter alia*, marketing and market research and consulting services; public and media relations services and sales promotion services.

5. ConnectPR is the owner of U.S. Trademark Registration No. 2,373,505 filed March 25, 1998 for the mark CONNECT PUBLIC RELATIONS used in connection with, *inter alia*, prerecorded audio recordings, prerecorded video recordings, and prerecorded audio-visual recordings featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services; electronic publications

featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services on computer discs and CD-ROMs.

6. ConnectPR is the owner of U.S. Trademark Registration No. 2,383,778, filed March 25, 1998 for the mark CONNECT PUBLIC RELATIONS used in connection with, *inter alia*, communications services, namely, delivery of messages by electronic transmission.

7. ConnectPR is the owner of U.S. Trademark Registration No. 2,365,074, filed March 25, 1998 for the mark CONNECTPR used in connection with, *inter alia*, communications services, namely, delivery of messages by electronic transmission.

8. ConnectPR is the owner of U.S. Trademark Registration No. 2,366,850, filed March 25, 1998 for the mark CONNECTPR used in connection with, *inter alia*, marketing and market research and consulting services; public and media relations services and sales promotion services.

9. ConnectPR is the owner of U.S. Trademark Registration No. 2,383,777, filed March 25, 1998 for the mark CONNECTPR used in connection with, *inter alia*, prerecorded audio recordings, prerecorded video recordings, and prerecorded audio-visual recordings featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services; electronic publications featuring topics in the fields of marketing and market research and consulting services, public and media relations services and sales promotion services on computer discs and CD-ROMs.

10. ConnectPR is the owner of U.S. Trademark Registration No. 2,713,692, filed March 25, 1998 for the mark CONNECTPR used in connection with, *inter alia*, Connect printed publications, namely, brochures in the fields of market research and consulting, public and media

relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion material, and seminar creation and operation.

11. ConnectPR is the owner of U.S. Trademark Registration No. 3,330,353, filed September 30, 2002 for the mark CONNECTPR used in connection with, *inter alia*, printed publications, namely, reports, brochures and press kits comprised of brochures, flyers, and press releases, in the fields of market research and consulting, public and media relations, sales promotion, strategic marketing planning, development of market positioning and messaging, background editorial support of sales promotion materials, and seminar creation and operation.

12. Collectively the CONNECT PUBLIC RELATIONS and CONNECTPR marks are referred to herein as the "ConnectPR Marks."

13. Printouts of each of ConnectPR's U.S. Trademark Registrations, identified above, are attached hereto as Exhibit A.

14. Upon information and belief, and according to the Trademark Electronic Search System ("TESS") maintained by the Trademark Office, Digitalmojo is the applicant for U.S. Trademark Application Serial No. 77/714,693 filed on April 15, 2009 (hereinafter "the '693 Application") for the mark CONNECT to be used in connection with:

Class 009 - Audio recordings featuring music; video recordings featuring music; downloadable audio and video recordings featuring music; prerecorded music on CD, DVD and other media.

Class 035 - Business marketing services in the nature of agency representation of companies marketing a variety of services to home owners and renters, namely, utility

hook-ups, telecommunication services, home security services, home warranties, home and yard maintenance, furniture and appliance rental; comparative marketing and advertising services for providers of residential and business telecommunications services, namely, for providers of broadband cable, DSL, fiber optic and satellite Internet access services, cable and satellite television, voice over IP, and long-distance telephone services; operation of telephone call centers for others; marketing of high speed telephone, Internet, and wireless access, and directing consumers to access providers; providing an online directory information service featuring information regarding, and in the nature of, classifieds; advertising and information distribution services, namely, providing classified advertising space via the global computer network; promoting the goods and services of others over the Internet; providing online computer databases and online searchable databases featuring classified listings and want ads; online business networking services; providing telephone directory information via global communications networks; providing an online interactive website obtaining users comments concerning business organizations, service providers, and other resources; providing information, namely, compilations, rankings, ratings, reviews, referrals and recommendations relating to business organizations, service providers, and other resources using a global computer network; providing telephone directory information via global communications networks; arranging for others the initiation and termination of telecommunication services and utility services in the nature of water, gas and electricity and consultation rendered in connection therewith.

Class 038 - Providing online chat rooms for registered users for transmission of messages concerning classifieds, virtual community and social networking; providing online chat rooms and electronic bulletin boards for transmission of messages among users in the field of general interest; providing email and instant messaging services.

Class 042 - Computer services, namely, creating an online community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; computer software development; application service provider (ASP) featuring software to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; providing temporary use of non-downloadable software applications for classifieds, virtual community, social networking, photo sharing, video sharing, and transmission of photographic images; computer services, namely, hosting online web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; computer services in the nature of customized web pages featuring user-defined information, personal profiles and information.

Class 045 - Online social networking services; Internet based dating, introduction and social networking services.

15. The '693 Application was filed as an intent to use application under § 1(b) of the Lanham Act.

16. The '693 Application was published for opposition on March 2, 2010.

17. On April 1, 2010, ConnectPR (through its counsel) filed a First 90 Day Request for Extension of Time to Oppose for Good Cause. The Request was granted by the Trademark Trial and Appeal Board (“TTAB”) on April 1, 2010, thereby extending the deadline until June 30, 2010.

18. On June 30, 2010, ConnectPR (through its counsel) filed a 60 Day Request for Extension of Time to Oppose for Good Cause. The Request was granted by the Trademark Trial and Appeal Board (“TTAB”) on June 30, 2010 thereby extending the deadline until August 29, 2010. Accordingly, the filing of the present Notice of Opposition is timely.

19. ConnectPR has used its ConnectPR Marks in interstate commerce in the United States since at least as early as the dates of first use recited in the respective registrations and is currently using the trademarks in interstate commerce.

20. Since long prior to the filing date and any date of first use in Applicant's '693 Application, ConnectPR has used the ConnectPR Marks in commerce in association with their respective goods and services identified in each registration.

21. The ConnectPR Marks are of significant value to ConnectPR as an identification of source in connection with the promotion, marketing, advertisement, and offering of at least the goods and services recited in the registrations for the ConnectPR Marks.

22. ConnectPR has used its ConnectPR Marks in connection with at least the goods and services recited in the registrations for its marks long before the filing date of the '693 Application.

### **THE GROUNDS FOR OPPOSITION**

23. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

24. Since long prior to the filing date of Applicant's U.S. Trademark Application No. 77/714,693, ConnectPR has used the ConnectPR Marks in connection with the goods and services identified in ConnectPR's respective trademark registrations identified above.

25. Opposer has used its ConnectPR Marks in interstate commerce since at least as 1998. Opposer has continuously used its ConnectPR Marks in interstate commerce since at least the dates of first use recited in the respective registrations and is currently using the marks in interstate commerce.

26. ConnectPR's marks are of significant value to Opposer ConnectPR as an identification of source in connection with the promotion, marketing, advertising, and offering of the goods and services recited in the registrations for the ConnectPR Marks.

27. The mark set forth in Applicant's U.S. Trademark Application No. 77/714,693 is likely to be confused with the ConnectPR Marks which are used by Opposer ConnectPR.

28. Opposer ConnectPR's use of the ConnectPR Marks occurred well in advance of Applicant's filing of the U.S. Trademark Application No. 77/714,693 for the CONNECT mark, and on information and belief, prior to any date of use that Applicant may allege.

29. Opposer ConnectPR believes that it will be damaged by the registration of U.S. Trademark Application No. 77/714,693, and hereby opposes the same.

#### **FIRST CLAIM FOR RELIEF**

##### **(Likelihood of Confusion - Class 009)**

30. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

31. Applicant's proposed CONNECT mark, when used in connection with the goods in International Class 009 as specified in the '693 Application, is likely to cause confusion with the ConnectPR Marks.

32. Applicant's proposed CONNECT mark is similar to the ConnectPR Marks in appearance, sound, meaning, and connotation and is likely to cause confusion, or to cause mistake, or to deceive.

33. The goods recited in International Class 009 as specified in the '693 Application are identical, similar or related to the goods and services of the ConnectPR marks.

34. Accordingly, the '693 Application should be denied registration under 15 U.S.C. §1052(d).

## **SECOND CLAIM FOR RELIEF**

### **(Likelihood of Confusion - Class 035)**

35. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

36. Applicant's proposed CONNECT mark, when used in connection with the services in International Class 035 as specified in the '693 Application, is likely to cause confusion with the ConnectPR Marks.

37. Applicant's proposed CONNECT mark is similar to the ConnectPR Marks in appearance, sound, meaning, and connotation and is likely to cause confusion, or to cause mistake, or to deceive.

38. The services recited in International Class 035 as specified in the '693 Application are identical, similar or related to the goods and services of the ConnectPR marks.

39. Accordingly, the '693 Application should be denied registration under 15 U.S.C. §1052(d).

### **THIRD CLAIM FOR RELIEF**

#### **(Likelihood of Confusion - Class 038)**

40. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

41. Applicant's proposed CONNECT mark, when used in connection with the services in International Class 038 as specified in the '693 Application, is likely to cause confusion with the ConnectPR Marks.

42. Applicant's proposed CONNECT mark is similar to the ConnectPR Marks in appearance, sound, meaning, and connotation and is likely to cause confusion, or to cause mistake, or to deceive.

43. The services recited in International Class 038 as specified in the '693 Application are identical, similar or related to the goods and services of the ConnectPR marks.

44. Accordingly, the '693 Application should be denied registration under 15 U.S.C. §1052(d).

### **FOURTH CLAIM FOR RELIEF**

#### **(Likelihood of Confusion - Class 042)**

45. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

46. Applicant's proposed CONNECT mark, when used in connection with the services in International Class 042 as specified in the '693 Application, is likely to cause confusion with the ConnectPR Marks.

47. Applicant's proposed CONNECT mark is similar to the ConnectPR Marks in appearance, sound, meaning, and connotation and is likely to cause confusion, or to cause mistake, or to deceive.

48. The services recited in International Class 042 as specified in the '693 Application are identical, similar or related to the goods and services of the ConnectPR marks.

49. Accordingly, the '693 Application should be denied registration under 15 U.S.C. §1052(d).

#### **FIFTH CLAIM FOR RELIEF**

##### **(Likelihood of Confusion - Class 045)**

50. ConnectPR repeats and incorporates by this reference each and every allegation contained in the previous paragraphs of this Notice of Opposition.

51. Applicant's proposed CONNECT mark, when used in connection with the services in International Class 045 as specified in the '693 Application, is likely to cause confusion with the ConnectPR Marks.

52. Applicant's proposed CONNECT mark is similar to the ConnectPR Marks in appearance, sound, meaning, and connotation and is likely to cause confusion, or to cause mistake, or to deceive.

53. The services recited in International Class 045 as specified in the '693 Application are identical, similar or related to the goods and services of the ConnectPR marks.

54. Accordingly, the '693 Application should be denied registration under 15 U.S.C. §1052(d).

**PRAYER FOR RELIEF**

WHEREFORE, ConnectPR prays that the registration sought by Applicant in the '693 Application be refused and that this Opposition be sustained in favor of Opposer ConnectPR.

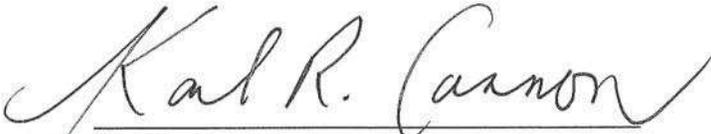
Any deficiency in the fee submitted can be charged to Deposit Account No. 50-0836.

All correspondence and telephonic communications should be directed to:

Karl R. Cannon  
Brett J. Davis  
Attorney Docket No. T12092.A.1  
CLAYTON, HOWARTH & CANNON, P.C.  
P.O. Box 1909  
Sandy, Utah 84091-1909  
Telephone: (801) 255-5335  
Facsimile: (801) 255-5338

DATED this 30<sup>th</sup> day of August, 2010.

Respectfully submitted,

  
Karl R. Cannon  
Brett J. Davis

**CLAYTON, HOWARTH & CANNON, P.C.**

P.O. Box 1909

Sandy, Utah 84091-1909

Telephone: (801) 255-5335

Facsimile: (801) 255-5338

Attorneys for Opposer

Connect Public Relations, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing **NOTICE OF OPPOSITION** to be served, via first class mail, postage prepaid, on this 30<sup>th</sup> day of August, 2010, to the attorney of record of the owner of record as identified on the Trademark Office's TARR database as follows:

Thomas W. Cook, Esq.  
Thomas Cook Intellectual Property Attorneys  
3030 Bridgeway, Suite 425-430  
Sausalito, California 94965-2810

with a courtesy copy of the same mailed via first class mail, postage prepaid, on this 30<sup>th</sup> day of August, 2010, to:

Thomas W. Cook, Esq.  
Thomas Cook Intellectual Property Attorneys  
P.O. Box 1989  
Sausalito, California 94965-1989

  
\_\_\_\_\_

# EXHIBIT A

Exhibit A to Notice of Opposition

**Int. Cl.: 16**

**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, and 50**

**Reg. No. 2,362,916**

**United States Patent and Trademark Office**

**Registered June 27, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**

**CONNECT PUBLIC RELATIONS**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: PRINTED PUBLICATIONS, NAMELY, REPORTS, PRESS KITS AND BROCHURES IN THE FIELDS OF MARKET RESEARCH AND CONSULTING, PUBLIC AND MEDIA RELATIONS, SALES PROMOTION, STRATEGIC MARKETING PLANNING, DEVELOPMENT OF MARKET POSITIONING AND MESSAGING, BACKGROUND EDI-

TORIAL SUPPORT OF SALES PROMOTION MATERIAL, AND SEMINAR CREATION AND OPERATION, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 6-0-1998; IN COMMERCE 6-0-1998.  
NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,522, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

**Int. Cl.: 35**

**Prior U.S. Cls.: 100, 101, and 102**

**Reg. No. 2,373,504**

**United States Patent and Trademark Office**

**Registered Aug. 1, 2000**

**SERVICE MARK  
PRINCIPAL REGISTER**

**CONNECT PUBLIC RELATIONS**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: MARKETING AND MARKET RESEARCH AND CONSULTING SERVICES; PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 5-0-1998; IN COMMERCE 5-0-1998.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,519, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

**Int. Cl.: 9**

**Prior U.S. Cls.: 21, 23, 26, 36, and 38**

**Reg. No. 2,373,505**

**United States Patent and Trademark Office**

**Registered Aug. 1, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**

**CONNECT PUBLIC RELATIONS**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: PRERECORDED AUDIO RECORDINGS, PRERECORDED VIDEO RECORDINGS, AND PRERECORDED AUDIO-VISUAL RECORDINGS FEATURING TOPICS IN THE FIELDS OF MARKETING AND MARKET RESEARCH AND CONSULTING SERVICES, PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES; ELECTRONIC PUBLICATIONS FEATURING TOPICS IN THE FIELDS OF MARKETING AND

MARKET RESEARCH AND CONSULTING SERVICES, PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES ON COMPUTER DISCS AND CD-ROMS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 7-0-1998; IN COMMERCE 7-0-1998.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,523, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

Int. Cl.: 38

Prior U.S. Cls.: 100, 101, and 104

Reg. No. 2,383,778

**United States Patent and Trademark Office**

Registered Sep. 5, 2000

**SERVICE MARK  
PRINCIPAL REGISTER**

**CONNECT PUBLIC RELATIONS**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: COMMUNICATIONS SERVICES, NAMELY, DELIVERY OF MESSAGES BY ELECTRONIC TRANSMISSION, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

FIRST USE 5-0-1999; IN COMMERCE 5-0-1999.  
NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,520, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

**Int. Cl.: 38**

**Prior U.S. Cls.: 100, 101, and 104**

**Reg. No. 2,365,074**

**United States Patent and Trademark Office**

**Registered July 4, 2000**

**SERVICE MARK  
PRINCIPAL REGISTER**

**CONNECTPR**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: COMMUNICATIONS SERVICES, NAMELY,  
DELIVERY OF MESSAGES BY ELECTRONIC

TRANSMISSION, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

FIRST USE 2-0-2000; IN COMMERCE 2-0-2000.

SN 75-456,495, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

Int. Cl.: 35

Prior U.S. Cls.: 100, 101, and 102

Reg. No. 2,366,850

**United States Patent and Trademark Office**

Registered July 11, 2000

**SERVICE MARK  
PRINCIPAL REGISTER**

**CONNECTPR**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: MARKETING AND MARKET RESEARCH AND CONSULTING SERVICES; PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 2-0-2000; IN COMMERCE 2-0-2000.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,494, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36, and 38

Reg. No. 2,383,777

**United States Patent and Trademark Office**

Registered Sep. 5, 2000

**TRADEMARK  
PRINCIPAL REGISTER**

**CONNECTPR**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: PRERECORDED AUDIO RECORDINGS, PRERECORDED VIDEO RECORDINGS, AND PRERECORDED AUDIO-VISUAL RECORDINGS FEATURING TOPICS IN THE FIELDS OF MARKETING AND MARKET RESEARCH AND CONSULTING SERVICES, PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES; ELECTRONIC PUBLICATIONS FEATURING TOPICS IN THE FIELDS OF MARKETING AND

MARKET RESEARCH AND CONSULTING SERVICES, PUBLIC AND MEDIA RELATIONS SERVICES AND SALES PROMOTION SERVICES ON COMPUTER DISCS AND CD-ROMS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 3-0-2000; IN COMMERCE 3-0-2000.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,498, FILED 3-25-1998.

CRAIG D. TAYLOR, EXAMINING ATTORNEY

Int. Cl.: 16

Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, and 50

Reg. No. 2,713,692

**United States Patent and Trademark Office**

Registered May 6, 2003

**TRADEMARK  
PRINCIPAL REGISTER**

**CONNECTPR**

CONNECT PUBLIC RELATIONS, INC. (UTAH CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: PRINTED PUBLICATIONS, NAMELY, REPORTS, PRESS KITS AND BROCHURES IN THE FIELDS OF MARKET RESEARCH AND CONSULTING, PUBLIC AND MEDIA RELATIONS, SALES PROMOTION, STRATEGIC MARKETING PLANNING, DEVELOPMENT OF MARKET POSITIONING AND MESSAGING, BACKGROUND EDITORIAL SUPPORT OF SALES PROMOTION MATERIAL, AND SEMINAR CREATION AND OP-

ERATION, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 9-0-2002; IN COMMERCE 9-0-2002.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PUBLIC RELATIONS", APART FROM THE MARK AS SHOWN.

SN 75-456,497, FILED 3-25-1998.

INGA ERVIN, EXAMINING ATTORNEY

Int. Cl.: 16

Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, and 50

Reg. No. 3,330,353

**United States Patent and Trademark Office**

Registered Nov. 6, 2007

**TRADEMARK  
PRINCIPAL REGISTER**

**CONNECTPR**

CONNECT PUBLIC RELATIONS, INC. (UTAH  
CORPORATION)  
80 EAST 100 NORTH  
PROVO, UT 84606

FOR: PRINTED PUBLICATIONS, NAMELY, RE-  
PORTS, BROCHURES AND PRESS KITS COM-  
PRISED OF BROCHURES, FLYERS, AND PRESS  
RELEASES, IN THE FIELDS OF MARKET RE-  
SEARCH AND CONSULTING, PUBLIC AND MED-  
IA RELATIONS, SALES PROMOTION, STRATEGIC  
MARKETING PLANNING, DEVELOPMENT OF  
MARKET POSITIONING AND MESSAGING, BACK-  
GROUND EDITORIAL SUPPORT OF SALES PRO-

MOTION MATERIALS, AND SEMINAR CREATION  
AND OPERATION, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23,  
29, 37, 38 AND 50).

FIRST USE 1-0-2006; IN COMMERCE 1-0-2006.

OWNER OF U.S. REG. NOS. 2,365,074, 2,366,850,  
AND 2,383,777.

SN 78-169,520, FILED 9-30-2002.

CAROLINE WOOD, EXAMINING ATTORNEY