

ESTTA Tracking number: **ESTTA744251**

Filing date: **05/04/2016**

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	CGI Group Inc.
Granted to Date of previous extension	05/04/2016
Address	1350 René-Lévesque Boulevard West Montreal, Quebec, H3G1T4 CANADA
Attorney information	Robert W. Zelnick MCDERMOTT WILL & EMERY LLP 500 North Capitol Street, NW Washington, DC 20001-1531 UNITED STATES rzelnick@mwe.com, ksandacz@mwe.com, dcipplit@mwe.com Phone:202.756.8000

Applicant Information

Application No	86508111	Publication date	01/05/2016
Opposition Filing Date	05/04/2016	Opposition Period Ends	05/04/2016
Applicant	Hong, Frank 402 Van Buren Drive Monterey Park, CA 91755 UNITED STATES		

Goods/Services Affected by Opposition

Class 042. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Charitable services, namely, providing a social-networking website that features technology that enables charitable contributions, coordinating and mobilizing volunteers; Creating an on-line community for philanthropists, nonprofits, community and charitable organizations, faith-based organizations, education, the public sector, corporations and businesses, and volunteers for the purpose of engaging in interactive discussions and activities that promote positive change, public benefits, and socially conscious behavior; Providing a website featuring a search engine for users to identify and locate non-profits, community and charitable organizations, activities that require funding, activities that require volunteers, and stories of interests

Applicant Information

Application No	86520701	Publication date	11/10/2015
Opposition Filing Date	05/04/2016	Opposition Period Ends	
Applicant	Hong, Frank 402 Van Buren Drive		

	Monterey Park, CA 91755 UNITED STATES
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Goods/Services Affected by Opposition

Class 042. First Use: 0 First Use In Commerce: 0

All goods and services in the class are opposed, namely: Application service provider (ASP) featuring software for use to enable or facilitate the uploading, downloading, streaming, posting, displaying, blogging, linking, sharing or otherwise providing electronic media or information over communication networks; Charitable services, namely, providing a website that feature technology that enables charitable contributions, coordinating and mobilizing volunteers; Computer services, namely, creating an on-line community for registered users to create personal profiles featuring social networking information and to transfer and share such information among individuals, multiple groups and websites; Computer services, namely, creating an on-line virtual environment for registered users to organize groups and events, participate in discussions, and engage in social, personal, business and community networking; Computer services, namely, hosting on-line web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; Computer services, namely, providing customized web pages featuring user-defined information; Creating an on-line community for communication of users to conduct meetings and have interactive discussions via communication networks, for users to transmit personal information, identify and confirm participation in activities, and communicate with other users utilizing social media features, for users to transfer personal identity data to and share personal identity data with and among multiple groups and websites and for philanthropists, nonprofits, community and charitable organizations, faith-based organizations, education, the public sector, corporations and businesses, and volunteers for the purpose of engaging in interactive discussions and activities that promote positive change, public benefits, and socially conscious behavior; Design, development, and implementation of software for use in managing multiple social networking service accounts, tracking link statistics and monitoring keyword mentions made on social networking websites; Peer-to-browser photo sharing services, namely, providing a website featuring technology enabling users to upload, view, and download digital photos; Providing a website featuring temporary use of non-downloadable software for assisting in website development, social networking, creating a virtual community, and transmission of audio, video, photographic images, text, graphics and data; Providing a website featuring a search engine for users to identify and locate non-profits, community and charitable organizations, activities that require funding, activities that require volunteers, and stories of interests; Providing a website that gives users the ability to create customized web pages featuring user-defined information; Providing on-line non-downloadable software for internet publishing

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act Section 2(d)
Dilution by blurring	Trademark Act Sections 2 and 43(c)

Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	2445561	Application Date	01/26/1999
Registration Date	04/24/2001	Foreign Priority Date	NONE
Word Mark	CGI		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15 computer software for rating and issuing insurance; computer software for administering insurance policies and insurance claims; computer software for analyzing risk in the field of insurance; computer software for managing and reporting information about pre-insurance inspections and physical damage inspection		

tions by members of the insurance industry; computer software for assembling documents and generating forms in the field of insurance; computer software for use by insurers to generate reports to governmental agencies; computer software for managing and reporting statistical information in the field of insurance; computer software for managing and reporting customer information; computer billing and accounting software; computer software for managing telecommunications networks; user manuals packaged as a unit with the foregoing goods

Class 016. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15

Newsletters in the field of information technology and business management; user manuals for use with computer software used by members of the financial services and telecommunications industries, namely, for use with software for rating and issuing insurance, for use with software for administering insurance policies and insurance claims, for use with software for analyzing risk in the field of insurance, for use with software for managing and reporting information about pre-insurance inspections and physical damage inspections, for use with software for assembling documents and generating forms, for use with software to generate reports to governmental agencies, for use with software for managing and reporting statistical information, for use with software for managing and reporting customer information, for use with billing and accounting software, and for use with software for managing telecommunications networks

Class 035. First use: First Use: 1980/12/00 First Use In Commerce: 1980/12/00

Consultancy services in the field of business management; information technology outsourcing services for others; business process outsourcing services for others

Class 042. First use: First Use: 1980/12/00 First Use In Commerce: 1980/12/00

Consultancy services in the field of information technology; information technology management services; information technology systems integration services

U.S. Registration No.	3539769	Application Date	02/20/2008
Registration Date	12/02/2008	Foreign Priority Date	NONE
Word Mark	CGI		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15</p> <p>Computer software for use in customer relationship management; Computer programs for document management; Computer software to monitor and analyze customer information related to credit risk, account transactions, payment history, buying decisions, and customer behavior and characteristics, for use in the fields of financial services, telecommunications, government and healthcare; Computer software for calculating, auditing, and administering commissions based on sales volume and customer account data; Computer software for managing accounting and financial data, for managing data relating to funds, pay-</p>		

	<p>ments, costs and accounts receivable, and for preparing financial reports; Computer software for use primarily by government human service agencies to manage, gather and report data relating to field visits, to record and transmit digital images, signatures and geographic data, to obtain maps and driving directions and to track the locations of caseworkers; Downloadable electronic publications in the nature of computer software user manuals; Downloadable electronic publications in the nature of articles and reports for use in the fields of financial services, logistics, health care, manufacturing, energy, retailing, telecommunications and public utilities; Computer software for investment asset allocation and portfolio optimization; Computer software for use by members of the financial services industry to initiate, process and report financial transactions; Computer software for financial calculation; Computer software for use in the field of business and financial services, namely, software for preparing and evaluating credit and loan applications, for obtaining pertinent data relating to such credit and loan applications from a variety of sources, and for identifying categories of credit, loan or other financial services which may be suitable for the person or organization seeking the credit or loan; Computer software for investment portfolio management, and for data analysis and reporting, used in the field of financial services; Computer software for use by healthcare providers to manage patient records and to generate correspondence, invoices and reports; Computer software for use by human resource departments to manage employee records and to generate correspondence and reports; Computer gateway software for use in the field of telecommunications; Computer software for processing billing and orders for goods and services; Computer software for use primarily by government human service agencies to manage, gather and report data relating to field visits, to record and transmit digital images, signatures and geographic data, to obtain maps and driving directions and to track the locations of caseworkers; Computer software for mobile workforce management, namely, software for communicating with field personnel, and for managing and reporting data on employee locations, schedules and tasks; Computer software for use by electric utilities to control power distribution and manage restoration of power after outages; Computer software for use in the oil and gas industry to capture and report field data</p> <p>Class 035. First use: First Use: 1980/12/00 First Use In Commerce: 1980/12/00 Business administration and management; Business records management; Business risk management consultation; Human resources management; Business services, namely, analyzing procurement expenses and practices for governmental agencies; Procurement, namely, purchasing goods and services on behalf of others, namely, purchasing apparel, office equipment and supplies, paper, computer hardware and peripherals, computer software, furniture, medical equipment and supplies, vehicles, laboratory equipment and supplies, lighting fixtures and supplies, mail room equipment, materials used in construction and road repairs, transportation services, lodging services, mailing services, preparing and serving foods, printing, document storage, health care, information technology consulting, maintenance of computers and software, telecommunications and temporary employment</p> <p>Class 041. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15 Training services in the fields of computer software, information technology and business management</p> <p>Class 042. First use: First Use: 1980/12/00 First Use In Commerce: 1980/12/00 Technical support services, namely, troubleshooting of computer hardware and software problems; Computer services, namely, hosting and maintaining a web site for others to exchange information about computer software use; Installation and maintenance of computer software; Updating of computer software for others; Computer project management services; Creating and maintaining web sites for others</p>
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U.S. Registration	2445560	Application Date	01/26/1999
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No.			
Registration Date	04/24/2001	Foreign Priority Date	NONE
Word Mark	CGI		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15 computer software for rating and issuing insurance; computer software for administering insurance policies and insurance claims; computer software for analyzing risk in the field of insurance; computer software for managing and reporting information about pre-insurance inspections and physical damage inspections by members of the insurance industry; computer software for assembling documents and generating forms in the field of insurance; computer software for use by insurers to generate reports to governmental agencies; computer software for managing and reporting statistical information in the field of insurance; computer software for managing and reporting customer information; computer billing and accounting software; computer software for managing telecommunications networks; user manuals packaged as a unit with the foregoing goods</p> <p>Class 016. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15 Newsletters in the field of information technology and business management; user manuals for use with computer software used by members of the financial services and telecommunications industries, namely, for use with software for rating and issuing insurance, for use with software for administering insurance policies and insurance claims, for use with software for analyzing risk in the field of insurance, for use with software for managing and reporting information about pre-insurance inspections and physical damage inspections, for use with software for assembling documents and generating forms, for use with software to generate reports to governmental agencies, for use with software for managing and reporting statistical information, for use with software for managing and reporting customer information, for use with billing and accounting software, and for use with software for managing telecommunications networks</p> <p>Class 035. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15 Consultancy services in the field of business management; information technology outsourcing services for others; business process outsourcing services for others</p> <p>Class 042. First use: First Use: 1998/10/15 First Use In Commerce: 1998/10/15</p>		

	Consultancy services in the field of information technology; information technology management services; information technology systems integration services
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U.S. Registration No.	4612117	Application Date	04/05/2013
Registration Date	09/30/2014	Foreign Priority Date	NONE
Word Mark	CGI ACCELERATE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2011/12/00 First Use In Commerce: 2011/12/00 Database management</p> <p>Class 042. First use: First Use: 2011/12/00 First Use In Commerce: 2011/12/00 Design, development, customization, installation, integration, implementation, testing, automated testing, upgrading, defect management, and maintenance of computer software; Data conversion services for implementation and testing of computer software; Configuration and testing of computer hardware</p>		

U.S. Registration No.	4302699	Application Date	03/16/2012
Registration Date	03/12/2013	Foreign Priority Date	NONE
Word Mark	CGI ADVANTAGE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 2012/07/17 First Use In Commerce: 2012/07/17 Computer software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for</p>		

	<p>use in the field of government and education</p> <p>Class 042. First use: First Use: 2012/04/18 First Use In Commerce: 2012/04/18</p> <p>Managed service provider (MSP) and application service provider (ASP) featuring software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education; providing temporary use of on-line non-downloadable software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education</p>
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U.S. Registration No.	4581046	Application Date	02/13/2013
Registration Date	08/05/2014	Foreign Priority Date	NONE
Word Mark	CGI ADVANTAGE360		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2013/06/04 First Use In Commerce: 2013/06/04</p> <p>Business management and consultation in the field of government and education; business process outsourcing and data processing services in the field of government and education</p> <p>Class 042. First use: First Use: 2013/06/04 First Use In Commerce: 2013/06/04</p> <p>Software as a service (SaaS) featuring software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education; providing on-line non-downloadable software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education</p>		

U.S. Registration No.	4010097	Application Date	02/12/2010
Registration Date	08/09/2011	Foreign Priority	NONE

		Date	
Word Mark	CGI COLLECTIONS360		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2011/05/00 First Use In Commerce: 2011/05/00 Business management and consultation in the field of debt collection; Business process outsourcing services in the field of debt collection; Data management service for use in reporting debt collection accounts to a collection agency; Datamanagement services for use in debt collection, namely, electronic data collection and on-line claims management; Data processing services</p> <p>Class 042. First use: First Use: 2011/05/00 First Use In Commerce: 2011/05/00 Providing temporary use of on-line non-downloadable software for use on behalf of creditors to store, manage, obtain and report information in the field of debt collection, negotiation, settlement and accounting</p>		

U.S. Registration No.	3716059	Application Date	02/25/2008
Registration Date	11/24/2009	Foreign Priority Date	NONE
Word Mark	CGI EDGE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 2009/10/06 First Use In Commerce: 2009/10/06 Computer software for use in the insurance industry, namely, computer software for the collection, editing, organizing, modifying, transmission, storage and sharing of data relating to insurance; computer software for insurance policy processing; computer software for insurance claim processing; computer software for insurance rating; computer software for insurance underwriting; computer software for ordering and receiving documents and reports from remote locations; computer software for managing the workflow of insurance professionals; computer software for translating and transferring computer data relating to insurance from one computer system to another and from one computer program</p>		

	to another; computer software for preparing, storing and printing insurance forms and other documents
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U.S. Registration No.	3664147	Application Date	04/17/2007
Registration Date	08/04/2009	Foreign Priority Date	NONE
Word Mark	CGI ENTERPRISE GATEWAY		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 2009/06/03 First Use In Commerce: 2009/06/03 Computer software for use in the field of business and financial services, namely, software for requesting, retrieving and analyzing data from various data sources for use in credit and loan originations, collections, recovery and marketing		

U.S. Registration No.	4126934	Application Date	06/09/2011
Registration Date	04/10/2012	Foreign Priority Date	NONE
Word Mark	CGI ENTERPRISE INTELLIGENCE360		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 042. First use: First Use: 2011/12/27 First Use In Commerce: 2011/12/27 Computer software design; Consulting services in the field of computer-based information systems for businesses; Hosting on-line web facilities for others for building and maintaining databases of business information, and for analyzing and reporting business information; Information technology consultation; Technical support services, namely, troubleshooting of computer software problems		

U.S. Registration No.	4067904	Application Date	02/12/2010
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Registration Date	12/06/2011	Foreign Priority Date	NONE
Word Mark	CGI GATEWAY360		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 042. First use: First Use: 2011/10/18 First Use In Commerce: 2011/10/18 Providing temporary use of on-line non-downloadable software for use by financial service providers to request, retrieve and analyze data from various data sources for use in credit and loan originations, collections and recovery		

U.S. Registration No.	4145246	Application Date	04/05/2011
Registration Date	05/22/2012	Foreign Priority Date	NONE
Word Mark	CGI HEALTH INSURANCE EXCHANGE360		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2011/02/21 First Use In Commerce: 2011/02/21 Business management and consultation in the field of health insurance and health insurance regulation; Business process outsourcing services in the field of health insurance; Data processing and business management in the field of health insurance business intelligence</p> <p>Class 042. First use: First Use: 2011/04/24 First Use In Commerce: 2011/04/24 Providing temporary use of on-line non-downloadable software for use by individuals and companies to obtain, evaluate, enroll and purchase health insurance and for use by government and the health industry to process and manage health insurance plans</p>		

U.S. Registration No.	3895369	Application Date	02/12/2010
Registration Date	12/21/2010	Foreign Priority	NONE

		Date	
Word Mark	CGI ORIGINATIONS360		
Design Mark	<p style="text-align: center;">CGI ORIGINATIONS360</p>		
Description of Mark	NONE		
Goods/Services	Class 042. First use: First Use: 2010/09/30 First Use In Commerce: 2010/09/30 Providing temporary use of on-line non-downloadable software for use by financial service providers to evaluate and process credit account applications and to manage the creation of credit accounts		

U.S. Registration No.	4247378	Application Date	01/17/2012
Registration Date	11/20/2012	Foreign Priority Date	NONE

Word Mark	CGI SOCIALBUSINESS360		
Design Mark	<p style="text-align: center;">CGI SOCIALBUSINESS360</p>		
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2012/07/00 First Use In Commerce: 2012/07/00 Consulting services in the field of business management</p> <p>Class 042. First use: First Use: 2012/07/00 First Use In Commerce: 2012/07/00 Providing online non-downloadable software for document management; Computer software development in the field of social networking for companies; Consulting services in the design and implementation of computer software for social networking; Technical support services, namely, installation, administration, and troubleshooting of software in the field of social networking for companies; Information technology consulting services in the field of taxonomy of data and metadata and the classification, categorization, and tagging of data for the purpose of searching and retrieving pertinent information; Consulting services in the field of information technology</p> <p>Class 045. First use: First Use: 2012/07/00 First Use In Commerce: 2012/07/00 Providing a computer database in the field of online social networking</p>		

U.S. Registration No.	4231557	Application Date	03/15/2012
Registration Date	10/23/2012	Foreign Priority Date	NONE
Word Mark	CGI SOCIALGOVERNMENT360		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2012/08/16 First Use In Commerce: 2012/08/16 Consulting services in the field of business management</p> <p>Class 042. First use: First Use: 2012/08/16 First Use In Commerce: 2012/08/16 Providing online non-downloadable software for document management; Computer software development in the field of social networking for companies; Consulting services in the design and implementation of computer software for social networking; Technical support services, namely, installation, administration, and troubleshooting of software in the field of social networking for companies; Information technology consulting services in the field of taxonomy of data and metadata and the classification, categorization, and tagging of data for the purpose of searching and retrieving pertinent information; Consulting services in the field of information technology</p> <p>Class 045. First use: First Use: 2012/08/16 First Use In Commerce: 2012/08/16 Providing a computer database in the field of online social networking</p>		

U.S. Registration No.	3959112	Application Date	02/12/2010
Registration Date	05/10/2011	Foreign Priority Date	NONE
Word Mark	CGI TRADE360		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 2010/03/00 First Use In Commerce: 2010/03/00 Financial information processing and analysis pertaining to trade finance and		

	supply chain finance transaction processing services, namely, pertaining to the issuance and settling of commercial letters of credit, standby letters of credit, documentary credits and guarantees; and the provision of information concerning such trade finance and supply chain finance transaction processing services, by way of the Internet
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U.S. Registration No.	4782533	Application Date	09/06/2013
Registration Date	07/28/2015	Foreign Priority Date	NONE

Word Mark	CGI WEALTH360
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Design Mark	
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Description of Mark	NONE
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Goods/Services	<p>Class 009. First use: First Use: 2012/11/00 First Use In Commerce: 2012/11/00 (Based on Use in Commerce) Financial portfolio management software used in the financial services industry; financial portfolio accounting and management computer software programs; software for use by the financial services industry as an asset allocation and portfolio optimizer; investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor-sponsored funds; computer software for database management; computer software for use in the financial services industry featuring security software and computer network security for use in multi-currency computation, electronic funds transfer, currency exchange management, and generation of bilingual business and financial statements; computer software for the management of the legislative features associated with registered and non-registered plans, including multi-currency capability for the financial services industry; computer software for conducting inventory control management; computer software for conducting and analyzing risk management in the fields of institutional investment dealers</p> <p>Class 035. First use: First Use: 2012/11/00 First Use In Commerce: 2012/11/00 (Based on Use in Commerce) Investment fund record-keeping services, namely, maintaining and recording positions in stocks, bonds, funds and other securities, financial record-keeping for investment risk management, regulatory compliance purposes, and accounting purposes; providing of services to mutual and investment fund managers to assist in managing a portfolio accounting and management computer program, namely, providing bookkeeping and administrative accounting services for mutual and investment fund managers, office functions in the nature of maintaining records of ownership of stocks, shares and securities for mutual and investment fund managers</p> <p>Class 037. First use: First Use: 0 First Use In Commerce: 0 (Based on 44(e)) Providing of services to mutual and investment fund managers to assist in managing a portfolio accounting and management computer program, namely, installation, maintenance and repair of computer hardware used with an investment accounting and management program</p>
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	<p>Class 041. First use: First Use: 2012/11/00 First Use In Commerce: 2012/11/00 (Based on Use in Commerce) Computer training, namely, training in the operation and use of investment portfolio management and investment fund shareholder record-keeping software for investment managers, administrators and advisors; training in relation to an investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor sponsored funds, namely, providing training in the use and operation of investment fund record-keeping software</p> <p>Class 042. First use: First Use: 2012/11/00 First Use In Commerce: 2012/11/00 (Based on Use in Commerce) Computer consultation; providing of services to mutual and investment fund managers to assist in managing a portfolio accounting and management computer program, namely, design and development of computer software for others, support in the nature of troubleshooting and diagnosing computer software problems for others, remote management of the information technology (IT) software systems of others; information, installation, maintenance and technical support services in relation to an investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor sponsored funds, namely, design and development of computer software for others, support in the nature of troubleshooting and diagnosing computer software problems for others, remote management of the information technology (IT) software systems of others; computer software project management services; customer service in the field of computer servicing, namely, troubleshooting of software and hardware problems and repair of software defects for others; software as a service (SAAS) services featuring software for business accounting, investment portfolio record keeping and financial record keeping; technical support services in the form of troubleshooting of computer software problems; computer network security services in the nature of user authentication, activity logging and disaster recovery services, namely, enforcing, restricting and controlling access privileges of users of computing resources for cloud, mobile or network resources based on assigned credentials, restricting access to and by computer networks to and of undesired web sites, media and individuals and facilities, computer disaster recovery planning, recovery of computer data and encrypted computer data services, namely, enforcing, restricting and controlling access privileges of users of computing resources for cloud, mobile or network resources based on assigned credentials, restricting access to and by computer networks to and of undesired web sites, media and individuals and facilities, computer disaster recovery planning, recovery of computer data and encrypted computer data</p>
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Attachments	<p>77401091#TMSN.png(bytes) 75627611#TMSN.png(bytes) 85896069#TMSN.png(bytes) 85571586#TMSN.png(bytes) 85848493#TMSN.png(bytes) 77934251#TMSN.png(bytes) 77404952#TMSN.png(bytes) 77158320#TMSN.png(bytes) 85342318#TMSN.png(bytes) 77934270#TMSN.png(bytes) 85286801#TMSN.png(bytes) 77934256#TMSN.png(bytes) 85518197#TMSN.png(bytes) 85570176#TMSN.png(bytes) 77934239#TMSN.png(bytes) 86057938#TMSN.png(bytes) 56684-145opposition.pdf(701042 bytes)</p>
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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	/Robert W. Zelnick/
Name	Robert W. Zelnick
Date	05/04/2016

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

CGI GROUP INC. and

CGI TECHNOLOGIES AND SOLUTIONS
INC.

Opposers,

v.

FRANK HONG,

Applicant.

Opposition No. _____

Serial Nos: 86/508,111 and 86/520,701

Mark: ONE WORLD CGI

NOTICE OF OPPOSITION

CGI GROUP INC., a corporation organized and existing under the laws of Canada, and CGI TECHNOLOGIES AND SOLUTIONS INC., a Delaware corporation (collectively, “Opposers”), will be damaged by registration of the marks in U.S. Application Serial Nos. 86/508,111 and 86/520,701 and request that registration be denied.

1. CGI Group Inc. and CGI Technologies and Solutions Inc. are related parties within the meaning of Trademark Act § 5 and Trademark Act § 45. CGI Technologies and Solutions Inc. is a wholly-owned subsidiary of a corporation, CGI Group Holdings USA Inc., which in turn is a wholly-owned subsidiary of CGI Group Inc. CGI Group Inc. asserts control over the activities of CGI Technologies and Solutions Inc., including the selection, adoption, and use of trademarks containing “CGI.”

2. Opposers are leading global providers in commerce of, *inter alia*, information technology (IT) services, computer application services, business consulting services, business process services, and computer infrastructure and systems integration services. CGI Group Inc.

is the fifth-largest independent IT and business process services company in the world and generates billions of dollars in annualized revenue in commerce. Opposers serve thousands of customers in commerce and across the world from its offices and delivery centers across the Americas, Europe and Asia Pacific.

3. Since long prior to Applicant's filing of its applications to register "ONE WORLD CGI", and prior to any use thereof by Applicant, Opposers have used, advertised, and promoted in commerce, and continue to use, advertise, and promote in commerce, the trademarks "CGI," "CGI & Design," and other "CGI"-formative marks identified in paragraph 4 below (collectively, "Opposers' CGI Marks") in connection with Opposers' broad range of products and services including, *inter alia*, information technology ("IT") consulting and business process services; software goods; software installation and maintenance services; creating, hosting and maintaining websites for others; design, development, implementation, and support services for computer software in the field of social networking; graphic design services; and, *inter alia*, the additional goods and services identified in the registrations cited in Paragraph 4 below (collectively "Opposers' Registered CGI Goods and Services"). Significantly for purposes of this Opposition, and since long prior to Applicant's filing of its applications to register "ONE WORLD CGI" and prior to any use thereof by Applicant, Opposers have (1) used Opposers' CGI Marks to offer Opposers' CGI Registered Goods and Services to customers in the field of charitable services, philanthropy and other high-visibility community service ventures and (2) offered their own charitable services, philanthropic services and community services (collectively, "Opposers' Charitable Services") in connection with Opposers' CGI Marks. Opposer's Registered CGI Goods and Services and Opposers' Charitable Services are hereinafter collectively referred to as "Opposers' CGI Goods and Services."

4. Opposers own extensive common law rights in and to Opposers' CGI Marks, based on Opposers' use of Opposers' CGI Marks in connection with Opposers' CGI Goods and

Services. In addition, Opposers own many U.S. registrations and active pending U.S. applications for Opposers' CGI Marks with a wide variety of products and services. Among the federal registrations owned by Opposers are the following, which are currently registered on the Principal Register and have not been cancelled:

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
CGI RN: 2445561 SN: 75627613	Renewed April 24, 2011 Int'l Class:09,16 First Use: October 15, 1998 Int'l Class:35,42 First Use: December, 1980 Filed: January 26, 1999 Application Published: July 18, 2000 Registered: April 24, 2001 Last Renewal: April 24, 2011	(Int'l Class: 09) computer software for rating and issuing insurance; computer software for administering insurance policies and insurance claims; computer software for analyzing risk in the field of insurance; computer software for managing and reporting information about pre-insurance inspections and physical damage inspections by members of the insurance industry; computer software for assembling documents and generating forms in the field of insurance; computer software for use by insurers to generate reports to governmental agencies; computer software for managing and reporting statistical information in the field of insurance; computer software for managing and reporting customer information; computer billing and accounting software; computer software for managing telecommunications networks; user manuals packaged as a unit with the foregoing goods (Int'l Class: 16) newsletters in the field of information technology and business management; user manuals for use with computer software used by members of the financial services and telecommunications industries, namely, for use with software for rating and issuing insurance, for use with software for administering insurance policies and insurance claims, for use with software for analyzing risk in the field of insurance, for use with software for managing and reporting information about pre-insurance inspections and physical damage inspections, for use with software for assembling documents and generating forms, for use with software to generate reports to governmental agencies, for use with software for managing and reporting statistical information, for use with software for managing and reporting customer information, for use with billing and accounting software, and for use with software for managing telecommunications networks (Int'l Class: 35) consultancy services in the field of business management; information technology outsourcing services for others; business process outsourcing services for others (Int'l Class: 42) consultancy services in the field of information technology; information technology management services; information technology systems integration services
CGI	Registered 8 & 15 October 22, 2014	(Int'l Class: 09) computer software for use in customer relationship management; computer programs for document

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
<p data-bbox="233 212 305 247">CGI</p> <p data-bbox="167 352 310 380">RN: 3539769</p> <p data-bbox="167 407 319 434">SN: 77401091</p>	<p data-bbox="586 191 784 352">Int'l Class:09,41 First Use: October 15, 1998 Int'l Class:35,42 First Use: December, 1980</p> <p data-bbox="586 380 805 569">Filed: February 20, 2008 Application Published: September 16, 2008 Registered: December 2, 2008</p>	<p data-bbox="836 191 1409 1856">management; computer software to monitor and analyze customer information related to credit risk, account transactions, payment history, buying decisions, and customer behavior and characteristics, for use in the fields of financial services, telecommunications, government and healthcare; computer software for calculating, auditing, and administering commissions based on sales volume and customer account data; computer software for managing accounting and financial data, for managing data relating to funds, payments, costs and accounts receivable, and for preparing financial reports; computer software for use primarily by government human service agencies to manage, gather and report data relating to field visits, to record and transmit digital images, signatures and geographic data, to obtain maps and driving directions and to track the locations of caseworkers; downloadable electronic publications in the nature of computer software user manuals; downloadable electronic publications in the nature of articles and reports for use in the fields of financial services, logistics, health care, manufacturing, energy, retailing, telecommunications and public utilities; computer software for investment asset allocation and portfolio optimization; computer software for use by members of the financial services industry to initiate, process and report financial transactions; computer software for financial calculation; computer software for use in the field of business and financial services, namely, software for preparing and evaluating credit and loan applications, for obtaining pertinent data relating to such credit and loan applications from a variety of sources, and for identifying categories of credit, loan or other financial services which may be suitable for the person or organization seeking the credit or loan; computer software for investment portfolio management, and for data analysis and reporting, used in the field of financial services; computer software for use by healthcare providers to manage patient records and to generate correspondence, invoices and reports; computer software for use by human resource departments to manage employee records and to generate correspondence and reports; computer gateway software for use in the field of telecommunications; computer software for processing billing and orders for goods and services; computer software for use primarily by government human service agencies to manage, gather and report data relating to field visits, to record and transmit digital images, signatures and geographic data, to obtain maps and driving directions and to track the locations of caseworkers; computer software for mobile workforce management, namely, software for communicating with field personnel, and for managing and reporting data on employee locations, schedules and tasks; computer software for use by electric utilities to control power distribution and manage restoration of power after outages; computer software for use in the oil and gas industry to capture and report field data (Int'l Class: 35)</p> <p data-bbox="836 1883 1390 1913">business administration and management; business</p>

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
		<p>records management; business risk management consultation; human resources management; business services, namely, analyzing procurement expenses and practices for governmental agencies; procurement, namely, purchasing goods and services on behalf of others, namely, purchasing apparel, office equipment and supplies, paper, computer hardware and peripherals, computer software, furniture, medical equipment and supplies, vehicles, laboratory equipment and supplies, lighting fixtures and supplies, mail room equipment, materials used in construction and road repairs, transportation services, lodging services, mailing services, preparing and serving foods, printing, document storage, health care, information technology consulting, maintenance of computers and software, telecommunications and temporary employment (Int'l Class: 41)</p> <p>training services in the fields of computer software, information technology and business management (Int'l Class: 42)</p> <p>technical support services, namely, troubleshooting of computer hardware and software problems; computer services, namely, hosting and maintaining a web site for others to exchange information about computer software use; installation and maintenance of computer software; updating of computer software for others; computer project management services; creating and maintaining web sites for others</p>
<p>CGI and Design</p>  <p>RN: 2445560 SN: 75627611</p>	<p>Renewed April 24, 2011</p> <p>Int'l Class:09,16,35,42 First Use: October 15, 1998</p> <p>Filed: January 26, 1999 Application Published: July 18, 2000 Registered: April 24, 2001 Last Renewal: April 24, 2011</p>	<p>(Int'l Class: 09) computer software for rating and issuing insurance; computer software for administering insurance policies and insurance claims; computer software for analyzing risk in the field of insurance; computer software for managing and reporting information about pre-insurance inspections and physical damage inspections by members of the insurance industry; computer software for assembling documents and generating forms in the field of insurance; computer software for use by insurers to generate reports to governmental agencies; computer software for managing and reporting statistical information in the field of insurance; computer software for managing and reporting customer information; computer billing and accounting software; computer software for managing telecommunications networks; user manuals packaged as a unit with the foregoing goods (Int'l Class: 16)</p> <p>newsletters in the field of information technology and business management; user manuals for use with computer software used by members of the financial services and telecommunications industries, namely, for use with software for rating and issuing insurance, for use with software for administering insurance policies and insurance claims, for use with software for analyzing risk in the field of insurance, for use with software for managing and reporting information about pre-insurance inspections and physical damage inspections, for use with software for assembling documents and generating forms, for use with</p>

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
		<p>software to generate reports to governmental agencies, for use with software for managing and reporting statistical information, for use with software for managing and reporting customer information, for use with billing and accounting software, and for use with software for managing telecommunications networks (Int'l Class: 35)</p> <p>consultancy services in the field of business management; information technology outsourcing services for others; business process outsourcing services for others (Int'l Class: 42)</p> <p>consultancy services in the field of information technology; information technology management services; information technology systems integration services</p>
<p>CGI ACCELERATE</p> <p>CGI ACCELERATE</p> <p>RN: 4612117</p> <p>SN: 85896069</p>	<p>Registered September 30, 2014</p> <p>Int'l Class:35,42 First Use: December, 2011</p> <p>Filed: April 5, 2013 Application Published: July 15, 2014 Registered: September 30, 2014</p>	<p>(Int'l Class: 35) database management (Int'l Class: 42) design, development, customization, installation, integration, implementation, testing, automated testing, upgrading, defect management, and maintenance of computer software; data conversion services for implementation and testing of computer software; configuration and testing of computer hardware</p>
<p>CGI ADVANTAGE</p> <p>CGI ADVANTAGE</p> <p>RN: 4302699</p> <p>SN: 85571586</p>	<p>Registered March 12, 2013</p> <p>Int'l Class:09 First Use: July 17, 2012 Int'l Class:42 First Use: April 18, 2012</p> <p>Filed: March 16, 2012 Application Published: September 25, 2012 Registered: March 12, 2013</p>	<p>(Int'l Class: 09) computer software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education (Int'l Class: 42) managed service provider (msp) and application service provider (asp) featuring software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education; providing temporary use of on-line non-downloadable software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education; providing temporary use of on-line non-downloadable software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt</p>

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
		management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education
CGI ADVANTAGE360 CGI ADVANTAGE360 RN: 4581046 SN: 85848493	Registered August 5, 2014 Int'l Class:35,42 First Use: June 4, 2013 Filed: February 13, 2013 Application Published: November 5, 2013 Registered: August 5, 2014	(Int'l Class: 35) business management and consultation in the field of government and education; business process outsourcing and data processing services in the field of government and education (Int'l Class: 42) software as a service (saas) featuring software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education; providing on-line non-downloadable software for use in financial management, procurement, budgeting and budget control, grant management, data management, permit and license management, case management, investment management, collections and debt management, performance measurement, human resource management, materials management, tax management, business intelligence and reporting for use in the field of government and education
CGI COLLECTIONS360 CGI COLLECTIONS360 RN: 4010097 SN: 77934251	Registered August 9, 2011 Int'l Class:35,42 First Use: May, 2011 Filed: February 12, 2010 Application Published: April 5, 2011 Registered: August 9, 2011	(Int'l Class: 35) business management and consultation in the field of debt collection; business process outsourcing services in the field of debt collection; data management service for use in reporting debt collection accounts to a collection agency; data management services for use in debt collection, namely, electronic data collection and on-line claims management; data processing services (Int'l Class: 42) providing temporary use of on-line non-downloadable software for use on behalf of creditors to store, manage, obtain and report information in the field of debt collection, negotiation, settlement and accounting
CGI EDGE CGI EDGE RN: 3716059 SN: 77404952	Registered 8 & 15 November 14, 2015 Int'l Class:09 First Use: October 6, 2009 Filed: February 25, 2008 Application	(Int'l Class: 09) computer software for use in the insurance industry, namely, computer software for the collection, editing, organizing, modifying, transmission, storage and sharing of data relating to insurance; computer software for insurance policy processing; computer software for insurance claim processing; computer software for insurance rating; computer software for insurance underwriting; computer software for ordering and receiving documents and reports from

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
	Published: July 8, 2008 Registered: November 24, 2009	remote locations; computer software for managing the workflow of insurance professionals; computer software for translating and transferring computer data relating to insurance from one computer system to another and from one computer program to another; computer software for preparing, storing and printing insurance forms and other documents
CGI ENTERPRISE GATEWAY <small>CGI ENTERPRISE GATEWAY</small> RN: 3664147 SN: 77158320	Registered 8 & 15 May 29, 2015 Int'l Class:09 First Use: June 3, 2009 Filed: April 17, 2007 Application Published: October 16, 2007 Registered: August 4, 2009	(Int'l Class: 09) computer software for use in the field of business and financial services, namely, software for requesting, retrieving and analyzing data from various data sources for use in credit and loan originations, collections, recovery and marketing
CGI ENTERPRISE INTELLIGENCE360 <small>CGI ENTERPRISE INTELLIGENCE360</small> RN: 4126934 SN: 85342318	Registered April 10, 2012 Int'l Class:42 First Use: December 27, 2011 Filed: June 9, 2011 Application Published: November 1, 2011 Registered: April 10, 2012	(Int'l Class: 42) computer software design; consulting services in the field of computer-based information systems for businesses; hosting on-line web facilities for others for building and maintaining databases of business information, and for analyzing and reporting business information; information technology consultation; technical support services, namely, troubleshooting of computer software problems
CGI GATEWAY360 <small>CGI GATEWAY360</small> RN: 4067904 SN: 77934270	Registered December 6, 2011 Int'l Class:42 First Use: October 18, 2011 Filed: February 12, 2010 Application Published: July 6, 2010 Registered: December 6, 2011	(Int'l Class: 42) providing temporary use of on-line non-downloadable software for use by financial service providers to request, retrieve and analyze data from various data sources for use in credit and loan originations, collections and recovery
CGI HEALTH INSURANCE EXCHANGE360 <small>CGI HEALTH INSURANCE EXCHANGE360</small>	Registered May 22, 2012 Int'l Class:35 First Use: February	(Int'l Class: 35) business management and consultation in the field of health insurance and health insurance regulation; business process outsourcing services in the field of health insurance; data processing and business

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
RN: 4145246 SN: 85286801	21, 2011 Int'l Class:42 First Use: April 24, 2011 Filed: April 5, 2011 Application Published: March 6, 2012 Registered: May 22, 2012	management in the field of health insurance business intelligence (Int'l Class: 42) providing temporary use of on-line non-downloadable software for use by individuals and companies to obtain, evaluate, enroll and purchase health insurance and for use by government and the health industry to process and manage health insurance plans
CGI ORIGINATIONS360 CGI ORIGINATIONS360 RN: 3895369 SN: 77934256	Registered December 21, 2010 Int'l Class:42 First Use: August 30, 2010 Filed: February 12, 2010 Application Published: July 6, 2010 Registered: December 21, 2010	(Int'l Class: 42) providing temporary use of on-line non-downloadable software for use by financial service providers to evaluate and process credit account applications and to manage the creation of credit accounts
CGI SOCIALBUSINESS360 CGI SOCIALBUSINESS360 RN: 4247378 SN: 85518197	Registered November 20, 2012 Int'l Class:35,42,45 First Use: July, 2012 Filed: January 17, 2012 Application Published: July 3, 2012 Registered: November 20, 2012	(Int'l Class: 35) consulting services in the field of business management (Int'l Class: 42) providing online non-downloadable software for document management; computer software development in the field of social networking for companies; consulting services in the design and implementation of computer software for social networking; technical support services, namely, installation, administration, and troubleshooting of software in the field of social networking for companies; information technology consulting services in the field of taxonomy of data and metadata and the classification, categorization, and tagging of data for the purpose of searching and retrieving pertinent information; consulting services in the field of information technology (Int'l Class: 45) providing a computer database in the field of online social networking
CGI SOCIALGOVERNMENT360 CGI SOCIALGOVERNMENT360 RN: 4231557	Registered October 23, 2012 Int'l Class:35,42,45 First Use: August 16, 2012 Filed: March 15, 2012	(Int'l Class: 35) consulting services in the field of business management (Int'l Class: 42) providing online non-downloadable software for document management; computer software development in the field of social networking for companies; consulting services in the design and implementation of computer software for social

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
SN: 85570176	Application Published: June 12, 2012 Registered: October 23, 2012	networking; technical support services, namely, installation, administration, and troubleshooting of software in the field of social networking for companies; information technology consulting services in the field of taxonomy of data and metadata and the classification, categorization, and tagging of data for the purpose of searching and retrieving pertinent information; consulting services in the field of information technology (Int'l Class: 45) providing a computer database in the field of online social networking
CGI TRADE360 CGI TRADE360 RN: 3959112 SN: 77934239	Registered May 10, 2011 Int'l Class:36 First Use: March, 2010 Filed: February 12, 2010 Application Published: August 31, 2010 Registered: May 10, 2011	(Int'l Class: 36) financial information processing and analysis pertaining to trade finance and supply chain finance transaction processing services, namely, pertaining to the issuance and settling of commercial letters of credit, standby letters of credit, documentary credits and guarantees; and the provision of information concerning such trade finance and supply chain finance transaction processing services, by way of the internet
CGI WEALTH360 CGI WEALTH360 RN: 4782533 SN: 86057938	Registered July 28, 2015 Int'l Class:09,35,37, 41,42 First Use: November, 2012 Filed: September 6, 2013 Application Published: September 30, 2014 Registered: July 28, 2015	(Int'l Class: 09) (based on use in commerce) financial portfolio management software used in the financial services industry; financial portfolio accounting and management computer software programs; software for use by the financial services industry as an asset allocation and portfolio optimizer; investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor sponsored funds; computer software for database management; computer software for use in the financial services industry featuring security software and computer network security for use in multi-currency computation, electronic funds transfer, currency exchange management, and generation of bilingual business and financial statements; computer software for the management of the legislative features associated with registered and non-registered plans, including multi-currency capability for the financial services industry; computer software for conducting inventory control management; computer software for conducting and analyzing risk management in the fields of institutional investment dealers (Int'l Class: 35) (based on use in commerce) investment fund record-keeping services, namely, maintaining and recording positions in stocks, bonds, funds and other securities, financial record-keeping for investment risk management, regulatory compliance purposes, and accounting purposes; providing of services to mutual and investment fund managers to assist in managing

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
		<p>a portfolio accounting and management computer program, namely, providing bookkeeping and administrative accounting services for mutual and investment fund managers, office functions in the nature of maintaining records of ownership of stocks, shares and securities for mutual and investment fund managers (Int'l Class: 37) (based on 44(e)) providing of services to mutual and investment fund managers to assist in managing a portfolio accounting and management computer program, namely, installation, maintenance and repair of computer hardware used with an investment accounting and management program (Int'l Class: 41) (based on use in commerce) computer training, namely, training in the operation and use of investment portfolio management and investment fund shareholder record-keeping software for investment managers, administrators and advisors; training in relation to an investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor sponsored funds, namely, providing training in the use and operation of investment fund record-keeping software (Int'l Class: 42) (based on use in commerce) computer consultation; providing of services to mutual and investment fund managers to assist in managing a portfolio accounting and management computer program, namely, design and development of computer software for others, support in the nature of troubleshooting and diagnosing computer software problems for others, remote management of the information technology (it) software systems of others; information, installation, maintenance and technical support services in relation to an investment fund record-keeping software for investment fund manufacturers of mutual funds, segregated funds and labor sponsored funds, namely, design and development of computer software for others, support in the nature of troubleshooting and diagnosing computer software problems for others, remote management of the information technology (it) software systems of others; computer software project management services; customer service in the field of computer servicing, namely, troubleshooting of software and hardware problems and repair of software defects for others; software as a service (saas) services featuring software for business accounting, investment portfolio record keeping and financial record keeping; technical support services in the form of troubleshooting of computer software problems; computer network security services in the nature of user authentication, activity logging and disaster recovery services, namely, enforcing, restricting and controlling access privileges of users of computing resources for cloud, mobile or network resources based on assigned credentials, restricting access to and by computer networks to and of undesired web sites, media and individuals and facilities, computer disaster recovery planning, recovery of computer data and encrypted</p>

Trademark / App. No. / Reg. No	Status/Key Dates	Goods/Services
		computer data services, namely, enforcing, restricting and controlling access privileges of users of computing resources for cloud, mobile or network resources based on assigned credentials, restricting access to and by computer networks to and of undesired web sites, media and individuals and facilities, computer disaster recovery planning, recovery of computer data and encrypted computer data

5. The registrations set forth in Paragraph 4 are valid and subsisting and in full force and effect. In addition, U.S. Registration Nos. 2445560, 2445561, 3539769, 3716059, and 3664147 have achieved incontestable status under 15 U.S.C. §§ 1065 and 1115(b).

6. Opposers have invested substantial resources to advertise and promote Opposers' CGI Goods and Services under Opposers' CGI Marks. Opposers have been recognized as leading IT services providers in a variety of magazines, journals, newspapers and other media. Opposers' advertising and promotional efforts combined with Opposers' commercial success have led to significant unsolicited media attention in relation to Opposers' CGI Marks in the United States and in global media outlets. Opposers have won dozens of awards in connection with Opposers' CGI Marks. Opposers' CGI Marks are widely recognized by the general consuming public.

7. By reason of Opposers' extensive investment of time, money and effort, including substantial sales, advertising and promotional activities, Opposers' CGI Marks have come to be recognized as exclusively signifying Opposers and Opposers' CGI Goods and Services. Opposers have built up extensive goodwill in Opposers' CGI Marks.

8. Opposers' CGI Marks are famous, and have been famous prior to Applicant's filing of its applications to register "ONE WORLD CGI", and prior to any use thereof by Applicant. The Trademark Trial and Appeal Board of the U.S. Patent and Trademark Office has

previously found Opposer's "CGI GROUP" service mark to be "famous." See U.S. Opposition No. 91183284, *CGI Group Inc. v. Cardinal Consulting, Inc.* (at pp. 17, 23).

9. Notwithstanding Opposers' rights in and to Opposers' CGI Marks, on January 20, 2015, Applicant filed U.S. Application Serial No. 86/508,111 for the mark "ONE WORLD CGI" for

Charitable services, namely, providing a website that features technology that enables charitable contributions, coordinating and mobilizing volunteers; Computer services, namely, hosting on-line web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; Computer services, namely, providing customized web pages featuring user-defined information; Creating an on-line community for philanthropists, nonprofits, community and charitable organizations, faith-based organizations, education, the public sector, corporations and businesses, and volunteers for the purpose of engaging in interactive discussions and activities that promote positive change, public benefits, and socially conscious behavior; Providing a website featuring a search engine for users to identify and locate non-profits, community and charitable organizations, activities that require funding, activities that require volunteers, and stories of interests

in International Class 42.

10. On February 1, 2015, Applicant filed U.S. Application Serial No. 86/520,701 for "ONE WORLD CGI" for

Application service provider (ASP) featuring software for use to enable or facilitate the uploading, downloading, streaming, posting, displaying, blogging, linking, sharing or otherwise providing electronic media or information over communication networks; Charitable services, namely, providing a website that features technology that enables charitable contributions, coordinating and mobilizing volunteers; Computer services, namely, creating an on-line community for registered users to create personal profiles featuring social networking information and to transfer and share such information among individuals, multiple groups and websites; Computer services, namely, creating an on-line virtual environment for registered users to organize groups and events, participate in discussions, and engage in social, personal, business and community networking; Computer services, namely, hosting on-line web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; Computer services, namely, providing customized web pages featuring user-defined information; Creating an on-line community for communication of users to conduct meetings and have interactive discussions via communication networks, for users to transmit personal information, identify and confirm participation in activities, and communicate with other users utilizing social media features, for users to transfer personal identity data to and share personal identity data with and among multiple groups and websites and for philanthropists, nonprofits, community and charitable organizations, faith-based organizations, education, the public sector, corporations and businesses, and volunteers for the purpose of engaging in interactive discussions and activities that promote positive change, public benefits, and socially conscious behavior. Design, development, and implementation of software for use in managing multiple social networking service accounts, tracking link statistics and monitoring keyword mentions made on social networking websites; Peer-to-browser photo sharing services, namely, providing a website featuring technology enabling users to upload, view, and download digital photos; Providing a web site featuring temporary use of non-downloadable software for assisting in website development, social networking, creating a virtual community, and transmission of audio, video, photographic images, text, graphics and data; Providing a website featuring a search engine for users to identify and locate non-profits, community and charitable organizations, activities that require funding, activities that require volunteers, and stories of interests; Providing a website that gives users the ability to create customized web pages featuring user-defined information; Providing on-line non-downloadable software for internet publishing

in International Class 42. Applicant's trademark "ONE WORLD CGI" as identified in U.S. Application Ser. Nos. 86/508,111 and 86/520,701 is hereinafter referred to as "Applicant's Mark."

11. Applicant's U.S. Application Serial No. 86/508,111 was published for opposition on January 5, 2016 in the Official Gazette (Trademarks) of the United States Patent and Trademark Office. The Board granted extensions of time to oppose Applicant's application until May 4, 2016. Thus, this Notice of Opposition is timely filed with respect to U.S. Application Serial No. 86/508,111.

12. Applicant's U.S. Application Serial No. 86/520,701 was published for opposition on November 10, 2015 in the Official Gazette (Trademarks) of the United States Patent and Trademark Office. The Board granted extensions of time to oppose Applicant's application until May 8, 2016. Thus, this Notice of Opposition is timely filed with respect to U.S. Application Serial No. 86/520,701.

13. Applicant's Mark "ONE WORLD CGI" contains the distinctive element "CGI" that appears in each and every one of Opposers' CGI Marks.

14. Applicant's applied-for services directly overlap with, and are similar and related to, Opposers' CGI Goods and Services.

15. Applicant's use and registration of "ONE WORLD CGI" with the applied-for services are likely to cause confusion, deception, and/or mistake among the relevant public.

16. The likelihood of consumer confusion is heightened in that "ONE WORLD CGI" combines Opposers' famous CGI mark with the trademark ONEWORLD owned by NetSuite, Inc. (U.S. Reg. No. 3652035). Opposers and NetSuite have previously collaborated on the offering of certain business services to the public. Thus, in addition to Opposers' concerns in relation to Applicant's intended use and attempted registration of a mark identical and/or

confusingly similar to Opposers' CGI Marks, registration of "ONE WORLD CGI" falsely implies that Applicant's business and Applicant's Mark reflect yet another collaboration between NetSuite, Inc. and Opposers.

17. Applicant's use and registration of "ONE WORLD CGI" are likely to dilute the distinctiveness of the Opposers' CGI Marks, which are famous.

18. Applicant's use and registration of "ONE WORLD CGI" are likely to falsely suggest a connection with Opposers and Opposers' CGI Marks.

19. Applicant's use and registration of "ONE WORLD CGI" interfere with Opposers' CGI Marks and will damage Opposers, their businesses and their goodwill.

20. WHEREFORE, Opposers believe that they would be damaged by registration of Applicant's Mark, and request that registration of Applicant's Mark be denied.

The requisite filing fee prescribed by 37 C.F.R. § 2.6(a)(17), in the amount of \$600.00, is being charged to Deposit Account No. 500417. If there are any additional fees due in connection with this Notice of Opposition, they should also be charged to Deposit Account No. 500417, and any excess fees should be credited to same. All correspondence relating to this matter should be directed to the undersigned attorneys for Opposer.

Respectfully submitted,

CGI GROUP INC.
CGI TECHNOLOGIES AND SOLUTIONS INC.

Dated: May 4, 2016

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