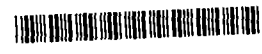


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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of: Serial No. 75/340,833
Date of Filing: August 14, 1997
Mark: ROYAL SUN
Date of Publication: September 8, 1998

Sun Life Assurance Company of)
Canada (U.S.) and Sun Life Assurance)
Company of Canada,)
)
Joint Opposers,)
)
v.)
)
Royal & SunAlliance USA Inc.,)
)
Applicant.)

Opposition No. 115,231
Serial No. 75/340,833

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Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3513

CONSENTED TO MOTION TO ACCEPT LATE-FILED ANSWER

Applicant, Royal & SunAlliance USA, Inc. ("Applicant") respectfully requests
that the Board accept the late filing of the attached Answer.

Applicant did not timely file the Answer because the undersigned attorneys for the
Applicant failed to docket the answer date. The undersigned attorneys typically direct all PTO
correspondence to the firm's New Haven address where the firm's PTO docketing clerk docket

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all PTO correspondence prior to distribution to the responsible attorneys. In this case, the notice resuming proceedings and setting the answer date was mailed to the undersigned's Hartford office, and was mistakenly filed without docketing the deadlines set forth therein.

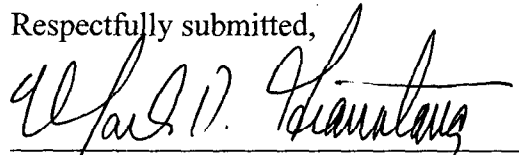
The undersigned first learned that this matter was in default for failure to timely file the attached Answer on February 8, 2002. The undersigned has discussed this Motion with counsel for the Opposer, Bingham B. Leverich, Esq., and counsel for the Opposer has consented to this Motion.

Accordingly, pursuant to TBMP § 317.02, it is respectfully submitted that the delay in filing the attached Answer was not the result of any willful conduct or gross neglect. Further, it is respectfully submitted that the Opposer will not be prejudiced by the delay. Neither party has taken any discovery and the parties have agreed to reset the trial dates in order to provide sufficient time to conduct discovery and otherwise prepare for the trial of this matter. Lastly, it is respectfully submitted that the Applicant has a meritorious defense to this action as reflected in the attached Answer.

It is therefore respectfully submitted that the Applicant has demonstrated good cause why this late-filed Answer should be accepted. Accordingly, it is respectfully requested that this late-filed Answer be accepted in order to allow this matter to be decided on its merits.

Date: February 11, 2002

Respectfully submitted,

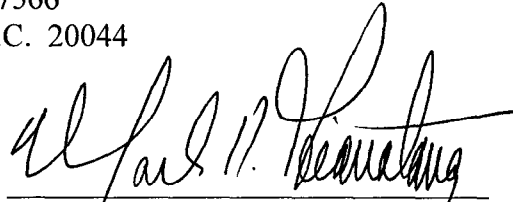


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New Haven, CT 06509-1960
(860) 275-6719

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **CONSENTED TO MOTION TO ACCEPT LATE-FILED ANSWER** was sent via first class mail, postage pre-paid on this 11th day of February, 2002 to:

Bingham B. Leverich
Kristina Rosette
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044



Mark D. Giarratana

.HrtLibl:387189.1 02/11/02