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

Proceeding	91163323
Party	Defendant Gravity Co., Ltd. Gravity Co., Ltd. 5th Floor, Shingu Bldg. 620-2, Shinsa-dong, Kangnam-ku KRX Seoul 135-894,
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Date	01/23/2006
Attachments	answer_001.pdf (5 pages)

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

OUTDOOR LIFE NETWORK, L.L.C.,)
)
 Opposer,)
)
 v.) Opposition No. 91163323
)
GRAVITY CO., LTD.,)
)
 Applicant.)

ANSWER TO NOTICE OF OPPOSITION

Applicant, GRAVITY CO., LTD. (“Applicant”), hereby answers the Notice of
Opposition filed by Opposer, OUTDOOR LIFE NETWORK, L.L.C. (“Opposer”), as follows:

1. Opposer is a limited liability company organized and existing under the laws of
Delaware, located and doing business at 281 Tresser Boulevard, Two Stamford Plaza, Stamford,
Connecticut 06901.

ANSWER:

Applicant is without knowledge or information sufficient to form a belief as to the truth
of the allegations of Paragraph 1 of the Notice of Opposition and therefore denies the same.

2. Upon information and belief, Applicant is a corporation organized and existing
under the laws of the Republic of Korea, located and doing business at 5th Floor, Shingu Bldg.
620-2, Shinsa-dong, Kangnam-ku, Seoul 135-894, Republic of Korea.

ANSWER:

Applicant admits the allegations set forth in the first sentence of Paragraph 2 of the
Notice of Opposition.

3. Applicant has filed Trademark Application Serial No. 76/507407 to register the
mark GRAVITY & Design in International Classes 6, 9, 16 and 41 for the goods and services
specified therein. This application was filed on an intent-to-use basis under Section 1(b) of the
Trademark Act with respect to all classes.

ANSWER:

Applicant admits the allegations set forth in the first sentence of Paragraph 3 of the Notice of Opposition.

4. Opposer is the owner of the following United States registered marks and applications, among others:

Registration 2,872,255 for the mark GRAVITY GAMES & Design in Class 9, filed May 10, 2002, and registered August 10, 2004.

Registration 2,522,255 for the mark GRAVITY GAMES & Design in Class 41, filed November 17, 2000, and registered December 25, 2001.

Registration 2,531,919 for the mark GRAVITY GAMES in Class 41, filed January 11, 2001 and registered January 22, 2002.

Application No. 76/201328 for the mark GRAVITY GAMES & Design in Classes 6, 9, 11, 12 and 28, filed January 29, 2001, and allowed for registration on February 25, 2003.

Application No. 75/578961 for the mark GRAVITY FESTIVAL in Classes 25 and 41, filed October 28, 1998, and allowed for registration on October 7, 2003.

These marks and other GRAVITY-related marks used and/or registered by Opposer (“Marks”) constitute a family of marks that are used together by Opposer in such a way that purchasers associate not only the individual marks, but use of term GRAVITY with Opposer.

ANSWER:

Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of the Notice of Opposition and therefore denies the same.

5. Opposer and its predecessors in interest have, since at least as early as January 5, 1999, prior to the filing of Applicant’s application, spent great sums of money and effort in using and promoting its Marks in connection with extreme sports exhibitions and competitions and with various goods and services related thereto. Such Marks have become nationally recognized.

ANSWER:

Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of the Notice of Opposition and therefore denies the same.

6. All of Opposer's applications enumerated above were filed prior to the filing date of Applicant's application and thus have priority over Applicant's captioned application. Two of these marks, Reg. Nos. 2,522,255 and 2,531,919, were registered prior to the filing date of Applicant's application.

ANSWER:

Applicant admits the allegations set forth in the first sentence of Paragraph 6 of the Notice of Opposition.

7. It is anticipated that Opposer will market CD-ROMs, online games and related goods and services under the GRAVITY or GRAVITY GAMES marks as areas of natural expansion relating to Opposer's extreme sports exhibitions and competitions provided under these same names. Accordingly, the use and registration of the mark GRAVITY by Applicant is likely to cause confusion in the relevant market and to cause the relevant purchasing public to assume that Applicant's goods and services identified by the mark GRAVITY are sold by Opposer, or that such goods and services originate with or are connected in some way with Opposer.

ANSWER:

Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the first sentence of Paragraph 7 of the Notice of Opposition and therefore denies the same. Applicant denies the allegations set forth in the second sentence of Paragraph 7 of the Notice of Opposition.

8. The use by Applicant of the mark GRAVITY, which mark is substantially similar to Opposer's Marks, dilutes the uniqueness and exclusivity of the Marks as used by Opposer and/or covered in its registrations and applications.

ANSWER:

Applicant denies the allegations set forth in Paragraph 8 of the Notice of Opposition.

9. Applicant's mark so resembles the Marks used and registered by Opposer as to be likely, when used in connection with the goods and/or services specified by Applicant, to cause confusion, or to cause mistake, or to deceive.

ANSWER:

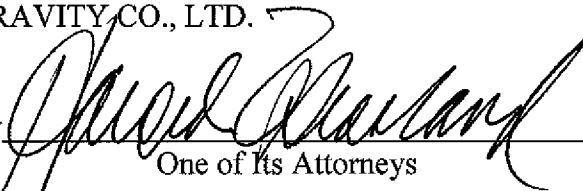
Applicant denies the allegations set forth in Paragraph 9 of the Notice of Opposition.

WHEREFORE, Applicant respectfully requests that Opposer's Notice of Opposition be dismissed and a registration of Applicant's mark be issued.

Respectfully submitted,

GRAVITY CO., LTD.

By




One of Its Attorneys

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CERTIFICATE OF TRANSMISSION

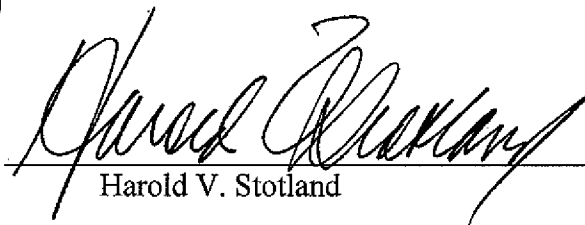
I hereby certify that the foregoing ANSWER TO NOTICE OF OPPOSITION is being transmitted by the Electronic System for Trademark Trials and Appeals to the United States Patent and Trademark Office on January 23, 2006.


Person signing certificate: Harold V. Stotland

CERTIFICATE OF SERVICE BY MAIL

I hereby certify that, on 1/23/06, a copy of the above Answer to Notice of Opposition was served on Opposer by mailing a copy by first-class mail, postage prepaid in an envelope addressed to:

David M. Silverman, Esq.
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue., N.W. Suite 200
Washington, DC 20006


Harold V. Stotland