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THE ADOLPH LAW GROUP, PLLC

A PROFESSIONAL LIMITED LIABILITY COMPANY

TODD LANDER
DIRECT DIAL (206) 386-7793
tlander@adolplaw.com
WWW.ADOLPHLAW.COM

SEVENTY-FIRST FLOOR
COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104

SEATTLE TELEPHONE:
(206) 621-7900

TELEFAX
(206) 682-3203

July 7, 2006

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

RE: Full Speed Ahead, Inc. v. SRAM Corporation: Notice of Opposition to Trademark Application Serial No. 78589700

Dear Sir/Madam:

Enclosed please find the following documents:

1. A Notice of Opposition in connection with the above-referenced trademark application;
2. A \$600.00 check, made out to the Director of the United States Patent and Trademark Office, representing the filing fees concerning the Opposition (the application being opposed seeks registration for two classes of goods, and our client opposes the application as to both classes, and thus we have submitted a \$600.00 fee to cover both classes of goods being opposed);
3. A Certificate of Mailing, attesting to the fact that the Notice of Opposition and related materials were deposited in the United States Express Mail on July 7, 2006; and
4. A conformed copy of the Notice of Opposition, with a self-addressed stamped envelope.

Please file the Notice of Opposition, and return the conformed copy to our offices in the self-addressed stamped envelope. Should you have any questions or concerns,

07-07-2006

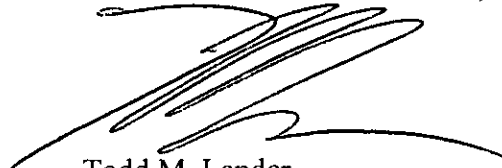
U.S. Patent & TMO/c/TM Mail Rcpt Dt #22

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
July 7, 2006
Page 2

please do not hesitate to contact me at 206-386-7793. Thank you for your attention to this matter.

Very truly yours,

THE ADOLPH LAW GROUP, PLLC



Todd M. Lander

TKB:sjr

US Patent-Trademark Office Trial-Appeal-Cover ltr 07-07-2006

Via Express Mail Post Office to Addressee # * ET437865726US *

Enclosures

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

In the matter of trademark application Serial No. 78589700
For the mark SRAM FORCE
Published in the Official Gazette on June 13, 2006

Full Speed Ahead, Inc.,

v.

SRAM Corporation,

NOTICE OF OPPOSITION

Opposer Full Speed Ahead, Inc., of 12810 NE 178th Street, Suite 102,
Woodinville, Washington, 98072, through its attorneys, Robert J. Adolph and Todd M.
Lander of Seattle, Washington, believing and alleging that it will be damaged by the
registration of the mark shown above in the above-entitled application, hereby opposes
the same. The application seeks registration of the above-referenced mark in two classes
of goods, international class 012 and international class 025, and the opposer opposes the
application with respect to both of these classes.

GROUND FOR OPPOSITION

1. The opposer ("FSA") manufactures and distributes high-end road,
mountain, triathlon, BMX and other bicycle parts. Since 2001, FSA has marketed and
sold bicycle parts under the established trademark K Force (the "K Force Mark"), and is
the lawful owner of that mark. FSA first used the K Force Mark in commerce as early as
2001, and that commercial use has continued since then. FSA currently markets no less
than five product categories under the K Force Mark.

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2. FSA has invested significant time and resources, dating back several years, to the development of the K Force Mark and, over that time, has generated invaluable good will in connection with the mark. The consuming public now identifies the mark --- and FSA --- with exemplary quality and design, and that identification provides irreplaceable economic value to FSA.

3. FSA has filed a standard "use" application for registration of the K Force Mark. That application, which was filed in the name of Tien Hsin Industries Co., Ltd, bears the Serial Number 78842759. FSA is Tien Hsin's assignee with respect to any and all interests concerning the K Force Mark and the pending application regarding that mark, and thus has standing to initiate this opposition proceeding.

4. SRAM, the applicant in connection with the above-referenced mark (the "SRAM Force Mark"), also manufactures and distributes bicycle parts, although it has traditionally focused its business on the mountain bicycle market. But recently, SRAM launched a line of road bicycle parts under the SRAM Force Mark, and which are directly competitive to FSA's K Force products. In addition, FSA believes and alleges that there is a substantial likelihood of customer confusion concerning the source of origin of the SRAM Force and K Force product lines. More particularly, this confusion is almost certain to ensue because, and among other things: (1) the two marks are similar in style, sound, verbiage and appearance; (2) the products sold under the respective marks are virtually identical in nature; (3) FSA and SRAM employ the same marketing channels for the two marks; (4) there is no record of SRAM ever using the word "force" in the marketing of any of its prior product lines, and the decision to do so in this case was clearly motivated by a desire to capitalize on consumer affection for FSA's K Force line;

and (5) the strength of the K Force Mark, and its link to quality and durability, is such that consumer confusion over the source of a similar sounding mark --- involving the same product type --- is inevitable.

5. For these reasons, FSA believes and alleges that the SRAM Force Mark infringes upon and dilutes its K Force Mark and will, if registered, continue to infringe upon and dilute the value of the K Force Mark, all to FSA's commercial and financial detriment. Moreover, FSA alleges that it has priority of use as it relates to these confusingly similar marks, since it has continually used the K Force Mark in commerce since as early as 2001. By contrast, SRAM admittedly had not used the SRAM Force in commerce as of the date of its own registration application --- March 17, 2005, since that application was an "intent to use" application.

6. For the foregoing reasons, FSA hereby respectfully opposes the above-referenced application.

Dated: June 7, 2006

By: 

Robert J. Adolph
Todd M. Lander
The Adolph Law Group, PLLC
701 Fifth Avenue, Suite 7100
Seattle, WA 98104
Attorneys for the Opposer, Full Speed Ahead, Inc.

CERTIFICATE OF MAILING

I, Sonja J. Rebmann, the undersigned under penalty of perjury of the laws of the State of Washington, declares that on this 7th day of July, 2006, on behalf of Full Speed Ahead, Inc., I caused true and correct copies of the following documents:

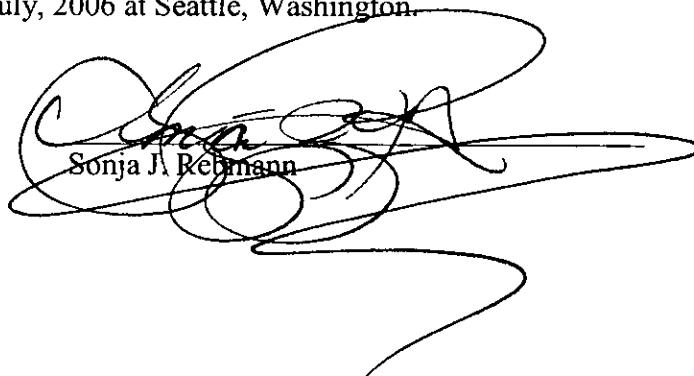
1. *Notice of Opposition;*
2. Check #3345 for \$600.00; and
3. *Certificate of Mailing*

to be sent Via "Express Mail Post Office to Addressee" - No: *ET437865726US* to the following:

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

EXECUTED this 7th July, 2006 at Seattle, Washington.


Sonja J. Rebmann

LAW OFFICES

THE ADOLPH LAW GROUP, PLLC
A PROFESSIONAL LIMITED LIABILITY COMPANY

7100 COLUMBIA CENTER
701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104

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