

**UNITED STATES PATENT & TRADEMARK OFFICE**

Commissioner for Trademarks P.O. Box 1451  
 Trademark Trial & Appeal  
 Alexandria, VA 22313-1451 1-800-786-9199  
 Trademark Act Section 2(d), 15 U.S.C. §1052(d). TMEP §704.02.

In re Application Serial No. 78/616,520  
 Filed: April 25, 2005  
 For Mark: GO CARDS  
 Published in the Official Gazette: April 18, 2006

St. Louis Cardinals LLC

\_\_\_\_\_,  
 Opposer,

v.

Douglas J. Lewis  
 \_\_\_\_\_,  
 Applicant.

)  
 ) **Mark: "Go Cards"**  
 )

) Opposition # **91172611**  
 )

**APPLICANT'S RESPONSE TO OPPOSERS RESPONSE DATED DECEMBER 5, 2006**

Applicant Doug Lewis respectfully request that the Board order opposers St. Louis Cardinals, to provide to applicant with its Notice of Opposition. As of to date Opposer upon receiving **the correct mailing address and correct e-mail** address for applicant has not provided applicant with its Notice of Opposition. Below is the corrected mailing address and e-mail address:

Mr. Doug Lewis  
 4143 Fox Crossing  
 St. Louis, Mo 63034-2009  
 314 341-8567  
 STL Products  
 Trademarked Products / ALL RIGHTS RESERVED  
 e-mail: [Marla34132@sbcglobal.net](mailto:Marla34132@sbcglobal.net)  
[www.cafepress.com/STLproducts](http://www.cafepress.com/STLproducts)

It is applicant position that opposer's clear BASIC knowledge of the marks: "Go Cards" v/s "St. Louis Cardinals" ***of the parties clearly do not look alike, sound alike, or project the same commercial impression. "Any" unfair competition claims are frivolous complaints.***

**OFFICE RECORDS SEARCH:** The Office records have been searched and no similar registered or pending mark has been found that would bar registration under Trademark Act Section 2(d), 15 U.S.C. §1052(d).  
 TMEP §704.02.

Nor is it good sportsmanship for the plaintiff to hold at bay and point the accusatory finger at the USPTO Attorneys for doing a phenomenal job when conducting their trademark search.

Applicant request that Opposer comply with BASIC constitutional Due Process Rights to Respond.

**Attorneys that know no likelihood of confusion exist between marks play a dirty game and attempt to win on unfair technicalities.**

We the people of the United States, in order to form a more perfect union, establish justice, insure domestic tranquility, provide for the common defense, promote the general welfare, and secure the blessings of liberty to ourselves and our posterity, do ordain and establish this Constitution for the United States of America.

The trademark examining attorney was right in ignoring opposers plead in making this examination of applicants application for registration of its "Go Cards(SM)" mark and ruling in his priority action on the merits that a search of the office records and has found no similar registered or pending State or Federal mark which would bar registration under Trademark Act Section 2(d), 15U.S.C. Section 1052(d).

C - State of Missouri Office of Secretary of State Registration Certificate #S016627 "Go Cards" with a first used date of March 20, 1999. Below is the corrected mailing address and e-mail address:

Mr. Doug Lewis  
4143 Fox Crossing  
St. Louis, Mo 63034-2009  
314 341-8567

Trademarked Products / ALL RIGHTS RESERVED  
e-mail: [Marla34132@sbcglobal.net](mailto:Marla34132@sbcglobal.net)  
[www.cafepress.com/STLproducts](http://www.cafepress.com/STLproducts)

I certify under the penalty of perjury that a copy of this response was e-mailed on December 11, 2006

addressed to attorney for plaintiff: [hlj@ccl.com](mailto:hlj@ccl.com) [trademark@ccl.com](mailto:trademark@ccl.com) [jzk@ccl.com](mailto:jzk@ccl.com)

Dated: December 11, 2006

Respectfully submitted,

By: 

Mr. Doug Lewis