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

Proceeding	91180491
Party	Defendant STANFORD FINANCIAL GROUP COMPANY
Correspondence Address	MICHAEL R. GRAIF VENABLE LLP PO BOX 34385 WASHINGTON, DC 20043-4385 UNITED STATES trademarkdocket@venable.com
Submission	Motion to Amend/Amended Answer or Counterclaim
Filer's Name	Michael R. Graif
Filer's e-mail	trademarkdocket@venable.com, MRGraif@Venable.com, DHawks@Venable.com
Signature	/Michael R. Graif/
Date	12/31/2007
Attachments	STANFORD EAGLE First Amended Answer.pdf ( 4 pages )(12444 bytes )

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

The Board of Trustees of the	)	
Leland Stanford Junior University	)	
	)	
Opposer	)	
	)	
v.	)	Opposition No. 91180491
	)	
Stanford Financial Group Company	)	
	)	
Applicant.	)	

APPLICANT'S FIRST AMENDED ANSWER

Applicant, Stanford Financial Group Company, through its counsel, hereby Answers the Notice of Opposition as follows:

Applicant denies each and every allegation of the Notice of Opposition (“Notice”) unless otherwise admitted or responded to as follows:

1. Answering paragraph 1 of the Notice, Applicant admits that Applicant filed U.S. trademark application Ser. No. 78/900,960 for STANFORD EAGLE for “printed periodicals in the field of global news and wealth management” on June 5, 2006, and that the application was published in the *Official Gazette* on July 3, 2007.

2. Applicant admits the allegations in paragraph 2 of the Notice.

3. Answering paragraph 3 of the Notice, Applicant lacks knowledge or information sufficient to form a belief concerning the allegations of paragraph 3 of the Notice, and therefore denies the same.

4. Answering paragraph 4 of the Notice, Applicant lacks knowledge or information sufficient to form a belief concerning the allegations of paragraph 4 of the Notice, and therefore denies the same.

5. Answering paragraph 5 of the Notice, Applicant lacks knowledge or information sufficient to form a belief concerning the allegations of paragraph 5 of the Notice, and therefore denies the same.

6. Applicant denies the allegations in paragraph 6 of the Notice.

7. Applicant denies the allegations in paragraph 7 of the Notice.

8. Applicant denies the allegations in paragraph 8 of the Notice.

9. Applicant denies the allegations in paragraph 9 of the Notice.

10. Applicant denies the allegations in paragraph 10 of the Notice, except that it admits that it filed U.S. trademark application Ser. No. 78/900,960 for STANFORD EAGLE for “printed periodicals in the field of global news and wealth management” in International Class 016 on June 5, 2006, and that it has distributed STANFORD EAGLE periodicals relating to global news and wealth management.

11. Applicant denies the allegations in paragraph 11 of the Notice.

12. Answering paragraph 12 of the Notice, Applicant lacks knowledge or information sufficient to form a belief concerning the allegations of paragraph 12 of the Notice, and therefore denies the same.

13. Applicant denies the allegations in paragraph 13 of the Notice.

14. Applicant denies the allegations in paragraph 14 of the Notice.

15. Applicant denies the allegations in paragraph 15 of the Notice.

16. Applicant denies the allegations in paragraph 16 of the Notice.

17. Applicant denies the allegations in paragraph 17 of the Notice.

AFFIRMATIVE DEFENSES

1. Each and every allegation in Opposer's Notice is barred by the doctrines of laches, estoppel and acquiescence.

2. Opposer's Notice fails to state a claim on which relief can be granted.

WHEREFORE, Applicant prays that the Notice of Opposition be denied, that this action be dismissed with prejudice, and that Application Serial No. 78/900,960 be forwarded for issuance of a Notice of Allowance.

Respectfully submitted,

Dated: December 31, 2007

/Michael R. Graif/  
Michael R. Graif  
VENABLE LLP  
P.O. Box 34385  
Washington, D.C. 20043-4385  
Telephone: (212) 808-5670  
Fax: (202) 344-8300  
Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the Answer has been served on The Board of Trustees of the Leland Stanford Junior University by mailing said copy on December 31, 2007, via First Class Mail, postage prepaid to:

Beth H. Parker, Esq.  
Bingham McCutchen LLP  
Three Embarcadero Center  
San Francisco, CA 94111

/Michael R. Graif/  
Michael R. Graif