



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

INTERNATIONAL DATA GROUP, INC. )  
and )  
IDG COMMUNICATIONS, INC. )  
Joint Opposers, )  
v. )  
ISAAC S. DANIEL )  
Applicant. )

Opposition No. \_\_\_\_\_

Serial No. 85/084,312 - IDG

Attorney's Reference: 31703-308545

10/13/2011 SHILSON1 00000009 220261 85084312

01 FC:6402 600.00 DA

**NOTICE OF OPPOSITION**

In the matter of the application for registration of the trademark IDG of Isaac S. Daniel shown in Application Serial No. 85/084,312, filed July 14, 2010, and published for opposition in the *Official Gazette* of June 21, 2011.

International Data Group, Inc., a Massachusetts corporation with its address at 5 Speen Street, Framingham, Massachusetts, 01701 and its subsidiary IDG Communications, Inc., a Massachusetts corporation with its address at 5 Speen Street, Framingham, Massachusetts, 01701 believe that they will be damaged by registration of the mark shown in said Application Serial No. 85/084,312, and hereby oppose the same.

As grounds for opposition it is alleged that:

1. Opposers are now and, for many years, have been engaged in the businesses of advertising, business consultation, online business marketing, arranging and conducting events and conferences, producing and selling magazines, newspapers and other printed and on-line publications, and providing information to others in the fields of computers, computer products, computer technology, information technology and computer software. Each of the Opposers is known as and generally referred to as IDG.



10-07-2011

2. Opposer IDG Communications, Inc. is the owner of U.S. Trademark Registration No. 3,490,347 issued August 19, 2008 for the mark IDG CONNECT as used to identify “advertising services, namely, general business networking referral services featuring the promotion of goods and services of others by generating business leads for group users; business consultation services, namely, customer acquisition and qualification services based on specified criteria, featuring services for customer lead generation; online business marketing services, namely, providing full service lead generation and customer acquisition programs.”
3. Opposer International Data Group, Inc. is the owner of U.S. Trademark Registration No. 2,074,088 issued June 24, 1997 for the mark IDG, as used to identify “computer services, namely, providing information in information technology fields, rendered by means of a global computer network.” This registration is currently in full force and effect and subject to the incontestability provisions of Section 15 of the Trademark Act.
4. Opposer International Data Group, Inc. is the owner of U.S. Trademark Registration No. 3,822,380 issued July 20, 2010 for the mark IDG KNOWLEDGE HUB as used to identify “Advertising services, Business consultation services; Providing a website of information about customer acquisition and qualification services for customer lead generation” in Class 35 and “Electronic publications, namely, newsletters in the fields of customer acquisition and qualification services for customer lead generation delivered via e-mail” in Class 41.
5. Opposer International Data Group, Inc. is the owner of U.S. Trademark Registration No. 2,317,003 issued February 8, 2000, for the mark IDG VENTURES as used to identify “providing venture capital to others for financing business ventures; providing venture capital investments and private equity investments to businesses in the technology, media, computer, and global computer network fields.” This registration is currently in full force and effect and subject to the incontestability provisions of Section 15 of the Trademark Act.

6. The Applicant has applied to register the trademark IDG for "Business management services directed to research and development companies" in Class 35.
7. Applicant's Application Serial No. 85/084,312 has been cited as a potential bar to registration of Opposer's Application Serial No. 85/162,158 for the mark IDG SOCIAL SCOUT covering "business services providing customized data and developing marketing programs for clients."
8. Applicant has alleged a date of first use of November 25, 2008.
9. Applicant did not use its IDG trademark, for the services listed in its application, in commerce in the United States prior to November 25, 2008.
10. The Applicant's mark is the term IDG.
11. Opposers' marks and trade names have been in use in commerce or have constructive use in commerce since prior to any date of first use that can be alleged by Applicant for its mark.
12. The mark IDG is so similar to Opposers' trademarks and trade names that Applicant's use of its trademark to identify its services is likely to cause confusion and lead to deception as to the source of origin and/or the sponsorship of Applicant's services and/or Opposer's goods and services.
13. If the Applicant were permitted to use and register its mark for its services as specified in its application, confusion among consumers resulting in damage and injury to Opposers would be caused by virtue of the similarity between applicant's trademark and Opposers' trademarks and trade names, and the related nature of the services covered by those names and marks. Any defect, objection or fault found with Applicant's services would reflect upon, and seriously injure the reputation and value that Opposers have established under their trademarks and trade names.

**WHEREFORE**, Opposers pray that said Application Serial No. 85/084,312 be rejected, that no registration be issued thereon to Applicant, and that this opposition be sustained in favor of the Opposers.

This Notice of Opposition is submitted in duplicate together with the statutory filing fee of \$600.00. Should any additional fee be required, please charge the same to our Account No. 22-0261, and notify us accordingly.

Opposer appoints Mark B. Harrison, Rebecca Liebowitz, Michael Hall and Jeremy Klass along with the law firm of Venable LLP, P.O. Box 34385, Washington, D.C. 20043-9998 to transact all business on its behalf in connection with this Opposition.

Respectfully submitted,

Date: October 7, 2011

By: \_\_\_\_\_



Attorneys for Opposer  
Mark B. Harrison  
Rebecca Liebowitz  
Michael Hall  
Jeremy Klass  
VENABLE  
P.O. Box 34385  
Washington, D.C. 20043-9998  
Telephone: 202/344-4800  
Facsimile: 202/344-8300

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **NOTICE OF OPPOSITION** was served by U.S. Mail, first class, postage prepaid, on this 7<sup>th</sup> day of October, 2011 on the Applicant's counsel at the address listed in the current U.S. Trademark Office Records as follows:

Alberto Interian III, Esq.  
Isaac Daniel Group, Inc.  
3401 SW 160th Avenue, Suite 430  
Miramar, FL 33028



Mark Harrison