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

Proceeding	91202169
Party	Defendant Isaac S. Daniel
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Date	11/22/2011
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**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. )  
\_\_\_\_\_ )

**In the Matter of**  
**Serial No. : 85/084,306**  
  
**Mark : IDG ISAAC DANIEL**  
**GROUP INC.**  
  
**OPPOSITION NO.: 91202169**

**ANSWER TO NOTICE OF OPPOSITION**

Isaac S. Daniel, a Florida individual, by and through its undersigned attorney, hereby files its Answer to International Data Group, Inc. and IDG Communications, Inc.’s (“Opposer”) Notice of Opposition, respectfully showing as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 1 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

2. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 2 of the Notice of Opposition, specifically whether Opposer is the current correct and proper owner of the claimed registration, and whether the claimed registration is currently valid and subsisting. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 3 of the Notice of Opposition, specifically whether Opposer is the current correct and proper owner of the claimed registration, and whether the

claimed registration is currently valid and subsisting. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 4 of the Notice of Opposition, specifically whether Opposer is the current correct and proper owner of the claimed registration, and whether the claimed registration is currently valid and subsisting. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 5 of the Notice of Opposition, specifically whether Opposer is the current correct and proper owner of the claimed registration, and whether the claimed registration is currently valid and subsisting. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

6. Admitted.

7. Admitted

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of allegations contained in Paragraph 9 of the Notice of Opposition. Since Applicant can neither admit nor deny the paragraph as written, Applicant must deny.

9. Denied.

10. Denied, as Applicant is without knowledge or information sufficient to form a belief as to Opposer's date of first use for the claimed marks and trade names; whether Opposer is the current correct and proper owner of the claimed marks and trade names; and whether each mark or trade name is currently valid and subsisting; and therefore Applicant is without knowledge and information sufficient to form a belief as to priority.

11. Denied.
12. Denied.

FURTHERMORE, Applicant sets forth the following in support of its position:

13. Applicant's mark is unique and distinctive.
14. The wording in Applicant's mark and Opposer's marks are different.
15. Applicant's mark and Opposer's marks are different in appearance.
16. Applicant's mark and Opposer's marks create different commercial impressions.
17. One of Opposer's claimed marks contains the word "CONNECT" not present in Applicant's mark.
18. One of Opposer's claimed marks contains the words "KNOWLEDGE HUB" not present in Applicant's mark.
19. One of Opposer's claimed marks contains the word "VENTURES" not present in Applicant's mark.
20. Applicant's mark contains the words "ISAAC DANIEL GROUP" not present in Opposer's marks.
21. Applicant's mark contains the word "INC." not present in Opposer's marks.
22. "IDG" is registered in numerous trademarks for technology related goods and services not owned by Opposer.
23. "IDG" is used in commerce by third parties as part of numerous trademarks for technology related goods and services.
24. Applicant's services and Opposer's services are not marketed through the same channels of trade.

25. Applicant does not provide advertising services.
26. Applicant does not provide computer services.
27. Applicant does not provide venture capital services.
28. Applicant does not provide customer acquisition and qualifications services.
29. Applicant does not provide electronic publications.
30. Applicant's mark and Opposer's marks are not likely to cause confusion, mistake or deception to consumers as to the source of Opposer's goods and services.
31. Applicant's mark and Opposer's marks are not likely to disparage or falsely suggest a trade connection between Opposer and Applicant.

#### **AFFIRMATIVE DEFENSES**

Applicant notes that some of Opposer's marks are contestable. Since Applicant lacks information or knowledge sufficient to confirm *inter alia* whether Opposer is in fact the correct current owner of the claimed marks, whether the claimed marks have priority of use, or whether the claimed marks are in fact being used for the goods and services described in their registrations, Applicant therefore reserves the right to contest the validity of said marks, such as by challenging priority, or asserting additional defenses, such as fraud on the United States Patent and Trademark Office, as may be appropriate upon completion of its investigation and discovery.

**WHEREFORE**, Applicant prays that the Trademark Trial and Appeal Board deny the Opposition and permit registration of Applicant's proposed mark in Application Serial Number 85/084,306.

Dated: November 22, 2011.

Respectfully submitted,

**Isaac S. Daniel**  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed through the electronic filing system of the U.S. Patent and Trademark Office, Trademark Trial and Appeal Board, and served by first class mail, postage prepaid, upon Opposer's counsel on November 22, 2011 to:

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