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

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer information

Name	Clark Capital Management Group, Inc.
Granted to date of previous extension	08/05/2026
Address	1650 MARKET STREET, 53RD FLOOR ONE LIBERTY PLACE PHILADELPHIA, PA 19103 UNITED STATES

Attorney information	**CAMILLE M. MILLER** COZEN O'CONNOR 1650 MARKET STREET, SUITE 2800 PHILADELPHIA, PA 19103 UNITED STATES Primary email: cmiller@cozen.com Secondary email: phipdocketing@cozen.com, abeck@cozen.com, lcosta@cozen.com Attorney docket number: CCMG5421US/00653191 Telephone number: 2156657273
Docket no.	CCMG5421US/00653191

Applicant information

Application no.	99433183	Publication date	04/07/2026
Opposition filing date	07/07/2026	Opposition period ends	08/05/2026
Applicant	ConsumerInfo.com, Inc. 475 ANTON BLVD COSTA MESA, CA 92626 United States		

Goods/services affected by opposition

Class 036. First Use: None First Use In Commerce: None
All goods and services in the class are opposed, namely: Debt consolidation services; consolidating credit card and loan debts via a personal loan; providing information via a website in the field of credit card and financial loan debt consolidation using personal loans; providing financial and credit information, and financial and credit planning tools to address debt payoff date, and pay down strategies

Grounds for opposition

Priority and likelihood of confusion	Trademark Act Section 2(d)

Marks cited by opposer as basis for opposition

U.S. registration no.	1662756	Application date	09/21/1990
Register	Principal		
Registration date	10/29/1991	Foreign priority date	NONE
Word mark	NAVIGATOR		
Design mark			
Description of mark			
Goods/services	Class 036. First use: First Use: Mar 10, 1987 First Use In Commerce: Mar 10, 1987 investment advisory services in the field of stocks and mutual funds		

U.S. registration no.	3698185	Application date	03/04/2009
Register	Principal		
Registration date	10/20/2009	Foreign priority date	NONE
Word mark	NAVIGATOR		
Design mark			
Description of mark			
Goods/services	Class 016. First use: First Use: Mar 10, 1987 First Use In Commerce: Mar 10, 1987 printed publication, namely, a newsletter in the field of investment advisory services in the field of stocks, bonds, annuities and mutual funds, investment consultation, asset allocation services and stock brokerage services Class 036. First use: First Use: Mar 10, 1987 First Use In Commerce: Mar 10, 1987 investment advisory services in the field of stocks, bonds, annuities and mutual funds; investment consultation; asset allocation services; stock brokerage services		

U.S. registration	2639961	Application date	06/10/1998

no.			
Register	Principal		
Registration date	10/22/2002	Foreign priority date	NONE
Word mark	NAVIGATOR FUND		
Design mark	NAVIGATOR FUND		
Description of mark			
Goods/services	Class 036. First use: First Use: Apr 1, 2002 First Use In Commerce: Apr 1, 2002 INVESTMENT ADVISORY SERVICES IN THE FIELD OF STOCKS AND MUTUAL FUNDS		

Attachments	74099288#TMSN.jpg(bytes) 77683006#TMSN.jpg(bytes) 75499466#TMSN.jpg(bytes) Notice of Opposition - EXPERIAN DEBT NAVIGATOR.pdf(981454 bytes)

Signature	/Camille M Miller/
Name	Camille Miller
Date	07/07/2026

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

In re Serial No.: 99/433,183
Trademark: EXPERIAN DEBT NAVIGATOR

Clark Capital Management Group, Inc. Opposer, v. ConsumerInfo.com, Inc. Applicant.	Opposition No. _____

NOTICE OF OPPOSITION

Opposer Clark Capital Management Group, Inc. ("Opposer"), a corporation organized under the laws of Pennsylvania and having a place of business at 1650 Market Street, One Liberty Place, 53rd Floor, Philadelphia, Pennsylvania 19103, believes that it would be damaged by and opposes registration of the mark EXPERIAN DEBT NAVIGATOR in United States Trademark Application Serial No. 99/433,183 under the provisions of 15 U.S.C. §§ 1052, 1063 and all other applicable authority. As grounds for opposition, Opposer alleges as follows:

1. Opposer is an independent asset management firm specializing in customized strategies for investors that is renowned for its ability to provide disciplined, consistent and reliable investment strategies to help clients reach their long-term goals.

2. Since at least as early as 1987, Opposer has used its NAVIGATOR® trademarks on or in connection with a wide variety of financial advisory and investment services to consumers throughout the United States. In the more than thirty years since it began using the NAVIGATOR trademarks, Opposer has expanded its offerings to include financial planning, financial consultancy, retirement planning, financial portfolio and investment management,

mutual funds and mutual fund brokerage, asset allocation, wealth management, investment consulting, investment advisory services in the field of stocks, bonds, annuities, and fund investment consultation services (collectively, "Opposer's Services").

3. Opposer owns United States Trademark Registration Number 1662756 for the trademark NAVIGATOR covering "investment advisory services in the field of stocks and mutual funds" in International Class 36, which issued October 29, 1991.

4. Opposer owns United States Trademark Registration Number 2639961 for the trademark NAVIGATOR FUND covering "investment advisory services in the field of stocks and mutual funds" in International Class 36, which issued October 22, 2002.

5. Opposer owns United States Trademark Registration Number 3698185 for the trademark NAVIGATOR covering, in relevant part, "investment advisory services in the field of stocks, bonds, annuities and mutual funds; investment consultation; asset allocation services; stock brokerage services" in International Class 36, which issued October 20, 2009.

6. The foregoing trademark registrations ("Opposer's Registrations") are valid, subsisting and, since they have become incontestable within the meaning of Section 15 of the Trademark Act (15 U.S.C. § 1065), are conclusive evidence that the registered marks are valid, that they are owned by Opposer and that Opposer has the exclusive right to use them in connection with the registered services in the United States.

7. As a result of Opposer's extensive use of the foregoing NAVIGATOR® marks, in addition to other stylized and composite marks incorporating the term NAVIGATOR, (collectively, "Opposer's Marks"), and given Opposer's investment of significant time, effort and expense in advertising, promoting and popularizing Opposer's Marks in the United States, Opposer's Marks have become well-known to a significant portion of the relevant consuming

public, who identify Opposer as the source of services offered under Opposer's Marks. Opposer has established significant goodwill in Opposer's Marks. Opposer's Marks and their associated goodwill are valuable assets of Opposer.

8. On October 8, 2025, Applicant ConsumerInfo.com, Inc. ("Applicant") filed Application Serial Number 99/433,183 (the "Challenged Application") to register the trademark EXPERIAN DEBT NAVIGATOR ("Applicant's Mark"). Applicant had to disclaim "DEBT" during prosecution of the Challenged Application.

9. The Challenged Application identifies "[d]ebt consolidation services; consolidating credit card and loan debts via a personal loan; providing information via a website in the field of credit card and financial loan debt consolidation using personal loans; providing financial and credit information, and financial and credit planning tools to address debt payoff date, and pay down strategies" in International Class 36 (the "Applicant's Services").

10. The time to oppose the Challenged Application pursuant to Section 13 of the Trademark Act (15 USC § 1063) has not expired. The Challenged Application was published in the *Official Gazette* on April 7, 2026 and Opposer filed its First Thirty Day Request for Extension of Time to Oppose on April 7, 2026.

11. On April 7, 2026, the Trademark Trial and Appeal Board granted Opposer's First Thirty Day Request for Extension of Time to Oppose until June 6, 2026.

12. On May 28, 2026, Opposer filed its Additional Sixty Day Request for Extension of Time to Oppose.

13. On May 28, 2026, the Trademark Trial and Appeal Board granted Opposer's Additional Sixty Thirty Day Request for Extension of Time to Oppose until August 5, 2026.

14. The Challenged Application interferes in Opposer's current or planned business because the Challenged Application identifies providing related financial information services.

15. Applicant's Services are closely related to Opposer's Services as both are financial services that provide consumers with information, advice, guidance, and tools concerning financial decision-making. Applicant's debt consolidation, credit planning, and financial information services are complementary to Opposer's investment advisory, investment consultation, asset allocation, and brokerage services in that each assists consumers in evaluating, managing, and improving their financial position. Such services are frequently offered by the same financial institutions and financial technology companies under a single mark, causing consumers to expect that the parties' respective services originate from or are sponsored by the same source.

16. Opposer reasonably believes it will be harmed if the Challenged Application matures to registration and Opposer has a real interest in the outcome of this proceeding.

17. Because the harm to Opposer is within the zone of interests protected by the Trademark Act and is proximately caused by registration of the Challenged Application, Opposer is entitled to bring this action pursuant to 15 U.S.C. § 1063.

Count I – PRIORITY AND LIKELIHOOD OF CONSUMER CONFUSION
15 U.S.C. § 1052(d)

18. Opposer repeats and realleges the allegations in paragraphs 1 through 17 above as though fully set forth herein.

19. Opposer's Marks are inherently distinctive.

20. Opposer began using and continues to use Opposer's Marks before any date that Applicant can claim for the purpose of priority. The filing date of the Challenged Application,

which is its constructive date of first use, is after Opposer began using Opposer's Marks and after the registration dates for Opposer's Registrations.

21. Applicant's Mark is similar in appearance, sound, meaning and overall commercial impression to Opposer's Marks.

22. Applicant's Mark encompasses the entirety of Opposer's NAVIGATOR® Marks, using the identical term NAVIGATOR along with the term "EXPERIAN" and descriptive term "DEBT" which was disclaimed.

23. NAVIGATOR is the most distinctive element of Opposer's Marks and Applicant's Mark and is the dominant feature of both Opposer's Marks and Applicant's Mark.

24. Applicant's Services are similar or related to Opposer's Services.

25. Applicant's Services travel in the same or similar channels of trade as Opposer's Services and would be used by the same class of consumers.

26. Because of the similarity of Applicant's Mark and Opposer's Marks and the similarity or relatedness of the services offered therewith, members of the public would likely believe that the Applicant's Services bearing the Applicant's Mark are sponsored by, affiliated with, or emanate from, Opposer, thereby causing a likelihood of confusion or mistake.

27. Consumers are likely to purchase Applicant's Services as a result of that confusion or mistake.

28. For these reasons, registration of Applicant's Mark with Applicant's Services is inconsistent with the standards for registration set forth in Section 2(d) of the Trademark Act (15 USC § 1052(d)).

PRAYER FOR RELIEF

WHEREFORE, for the reasons set forth above, Opposer Clark Capital Management Group, Inc. respectfully requests that this opposition be sustained in its entirety and that registration of Application Ser. No. 99/433,183 be refused.

Dated: July 7, 2026 Respectfully submitted by:

COZEN O'CONNOR

/s/ Camille M. Miller

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Attorneys for Opposer

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on July 7, 2026, a copy of the foregoing NOTICE OF OPPOSITION is being electronically filed with the United States Patent and Trademark Office, Trademark Trial and Appeal Board, at http://estta.uspto.gov/.

/s/ Camille M. Miller
Camille M. Miller

EXHIBIT A

United States of America
United States Patent and Trademark Office

NAVIGATOR

Reg. No. 3,698,185
Registered Oct. 20, 2009

Int. Cls.: 16 and 36

TRADEMARK
SERVICE MARK
PRINCIPAL REGISTER

CLARK CAPITAL MANAGEMENT GROUP, INC. (PENNSYLVANIA CORPORATION)
ONE LIBERTY PLACE, 53RD FLOOR
1650 MARKET STREET
PHILADELPHIA, PA 19103

FOR: PRINTED PUBLICATION, NAMELY, A NEWSLETTER IN THE FIELD OF INVESTMENT ADVISORY SERVICES IN THE FIELD OF STOCKS, BONDS, ANNUITIES AND MUTUAL FUNDS, INVESTMENT CONSULTATION, ASSET ALLOCATION SERVICES AND STOCK BROKERAGE SERVICES, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 3-10-1987; IN COMMERCE 3-10-1987.

FOR: INVESTMENT ADVISORY SERVICES IN THE FIELD OF STOCKS, BONDS, ANNUITIES AND MUTUAL FUNDS; INVESTMENT CONSULTATION; ASSET ALLOCATION SERVICES; STOCK BROKERAGE SERVICES, IN CLASS 36 (U.S. CLS. 100, 101 AND 102).

FIRST USE 3-10-1987; IN COMMERCE 3-10-1987.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 1,662,756, 3,292,265, AND 3,608,683.

SER. NO. 77-683,006, FILED 3-4-2009.

BRIDGETT SMITH, EXAMINING ATTORNEY

UNITED STATES PATENT AND TRADEMARK OFFICE · DEPARTMENT OF COMMERCE

David J. Kappos

Director of the United States Patent and Trademark Office

Int. Cl.: 36

Prior U.S. Cls.: 100, 101, and 102

United States Patent and Trademark Office

Reg. No. 2,639,961

Registered Oct. 22, 2002

SERVICE MARK
PRINCIPAL REGISTER

NAVIGATOR FUND

CLARK CAPITAL MANAGEMENT GROUP, INC.
(PENNSYLVANIA CORPORATION)
1735 MARKET STREET
MELLON BANK CENTER, 34TH FLOOR
PHILADELPHIA, PA 19103

FOR: INVESTMENT ADVISORY SERVICES IN THE FIELD OF STOCKS AND MUTUAL FUNDS, IN CLASS 36 (U.S. CLS. 100, 101 AND 102).

FIRST USE 4-1-2002; IN COMMERCE 4-1-2002.

OWNER OF U.S. REG. NOS. 1,536,741, 1,904,627, AND OTHERS.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "FUND", APART FROM THE MARK AS SHOWN.

SN 75-499,466, FILED 6-10-1998.

MICHAEL SOUDERS, EXAMINING ATTORNEY

Int. Cl.: 36

Prior U.S. Cl.: 102

United States Patent and Trademark Office

Reg. No. 1,662,756

Registered Oct. 29, 1991

SERVICE MARK
PRINCIPAL REGISTER

NAVIGATOR

CLARK CAPITAL MANAGEMENT GROUP INC., THE (PENNSYLVANIA CORPORATION)
51ST FLOOR
ONE LIBERTY PLACE
PHILADELPHIA, PA 19103

FOR: INVESTMENT ADVISORY SERVICES IN THE FIELD OF STOCKS AND MUTUAL FUNDS, IN CLASS 36 (U.S. CL. 102).

FIRST USE 3-10-1987; IN COMMERCE 3-10-1987.

OWNER OF U.S. REG. NO. 1,536,741.

SER. NO. 74-099,288, FILED 9-21-1990.

JOAN LESLIE BISHOP, EXAMINING ATTORNEY