

ESTTA Tracking number: **ESTTA324030**

Filing date: **12/23/2009**

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

Proceeding	92049973
Party	Plaintiff ABBYY Software Ltd.
Correspondence Address	Roy Ching Merit Law Group PC 201 San Antonio Circle, Ste. 105 Mountain View, CA 94040 UNITED STATES rching@mlgpc.com
Submission	Other Motions/Papers
Filer's Name	Roy Ching
Filer's e-mail	rching@mlgpc.com
Signature	/Roy Ching/
Date	12/23/2009
Attachments	Exhibits submitted by Petitioner 20091223.pdf (5 pages)(23874 bytes) EXHIBIT 24 1.pdf (1 page)(124715 bytes) EXHIBIT 24 2.pdf (1 page)(234078 bytes) EXHIBIT 24 3.pdf (1 page)(233173 bytes) EXHIBIT 24 5.pdf (1 page)(172319 bytes) EXHIBIT 24 6.pdf (1 page)(168485 bytes) EXHIBIT 24 7.pdf (1 page)(169059 bytes) EXHIBIT 24 8.pdf (1 page)(254002 bytes) EXHIBIT 24 9.pdf (1 page)(172701 bytes) EXHIBIT 24 10.pdf (1 page)(163841 bytes) EXHIBIT 24 11.pdf (1 page)(168738 bytes) EXHIBIT 24 12.pdf (1 page)(148650 bytes) EXHIBIT 24 13.pdf (1 page)(139634 bytes) EXHIBIT 24 14.pdf (1 page)(141224 bytes) EXHIBIT 24 15.pdf (1 page)(135558 bytes) EXHIBIT 24 16.pdf (1 page)(219530 bytes) EXHIBIT 24 17.pdf (1 page)(203682 bytes) EXHIBIT 24 18.pdf (1 page)(189241 bytes) EXHIBIT 24 19.pdf (1 page)(287178 bytes) EXHIBIT 24 20.pdf (1 page)(201643 bytes) EXHIBIT 24 21.pdf (1 page)(211108 bytes) EXHIBIT 24 22.pdf (1 page)(129533 bytes) EXHIBIT 24 23.pdf (1 page)(233411 bytes) EXHIBIT 24 24.pdf (1 page)(213341 bytes) EXHIBIT 24 25.pdf (1 page)(211308 bytes) EXHIBIT 24 26.pdf (1 page)(202021 bytes) EXHIBIT 24 27.pdf (1 page)(176905 bytes) EXHIBIT 24 28.pdf (1 page)(191493 bytes) EXHIBIT 24 29.pdf (1 page)(208409 bytes) EXHIBIT 24 30.pdf (1 page)(168195 bytes) EXHIBIT 24 31.pdf (1 page)(169797 bytes) EXHIBIT 24 32.pdf (1 page)(208513 bytes) EXHIBIT 24 33.pdf (1 page)(174273 bytes) EXHIBIT 24 34.pdf (1 page)(165945 bytes) EXHIBIT 24 35.pdf (1 page)(136484 bytes) EXHIBIT 24 36.pdf (1 page)(190540 bytes) EXHIBIT 24 37.pdf (1 page)(175476 bytes)

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

<p>ABBYY SOFTWARE LTD.</p> <p style="text-align: center;">Petitioner,</p> <p style="text-align: center;">v.</p> <p>ECTACO INC.</p> <p style="text-align: center;">Registrant.</p>	<p>Cancellation No. 92049973</p> <p>PETITIONER’S EXHIBITS AND NOTICE OF RELIANCE</p> <p>Mark: LINGVOSOFT Reg. No. 3,015,325 Reg. Date: November 15, 2005</p>
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Petitioner hereby gives notice that it intends to rely upon the below described Exhibits in support of its Petition, and moves for such Exhibits to be admitted as evidence. The Affidavits filed with these Exhibits authenticate and provide additional information concerning them.

Exhibits that have been designated “Confidential” by either party will be submitted separately through the ESTTA’s confidential document filing system. Counsel for the parties have stipulated to this manner of submission of confidential documents.

Exhibit #	Description	Bates #
1	Wikipedia print out	P00184-P00185
2	Print out from ABBYY website relating to Lingvo	P00071 – P00072, P00112 – P00114
2	Screenshots and boxshots	P00001,P00002, P00028,P00044, P00461, P00014- P00015
3	Article by Moscow Times on November 21, 1996 regarding BIT Software	P00111
4	Award for Lingvo 10	P00061
4	Translation for Award for Lingvo 10	P00436
4	Award for Lingvo X3 PC Magazine 2008, Award Lingvo X3 Mobile SoftTool 2008	P00062

Exhibit #	Description	Bates #
4	Translation for Lingvo X3 PC Magazine	P00437
4	Translation for Lingvo X3 Mobile SoftTool	P00438
4	Award for Lingvo PC World 2000, Award Lingvo v. 7 PC World 2001	P00063
4	Translation Lingvo PC World 200	P00439
4	Translation for Lingvo v. 7 PC World 2001	P00440
4	Award for Lingvo 7 from PC World / Open Systems 2002	P00064
4	Translation for Award Lingvo 7 PC World / Open Systems 2002	P00441
4	Award from PC World / Open Systems for Lingvo v.8 2003, Award from PC World / Open Systems for Lingvo 2004, Award from PC World / Open Systems for Lingvo 2005	P00065
4	Translation for award from PC World / Open Systems for Lingvo v.8 2003	P00442
4	Translation for award from PC World / Open Systems for Lingvo 2004	P00443
4	Translation for award from PC World / Open Systems for Lingvo 2005	P00444
4	Award from PC World / Open Systems for Lingvo 2007, award from PC World / Open Systems for Lingvo 2006	P00066
4	Award from PC World / Open Systems for Lingvo 2007	P00445
4	Award from PC World / Open Systems for Lingvo 2006	P00446
4	Website – about Multilingual	P00098, P00447 – P00450
4	Website – about PCMag and Ziff Davis	P00451 – P00454
4	Website – about PC World	P00455 – P00456
4	Website – about Open Systems Media	P00457 – P00459
4	Google search “ Open systems publishers”	P00460
5	Report from Moscow State University	P00250 – P00278
5	Translation for report from Moscow State University	P00374 – P00402
6	Print-out from ABBYY’s website relating to the company	P00350 – P00351
6	<i>Confidential</i>	Confidential P00193
6	<i>Confidential</i>	Confidential P00352
6	<i>Confidential</i>	Confidential P00197 - Confidential P00198
6	<i>Confidential</i>	Confidential-P00462 – Confidential- P00463
7	<i>Confidential</i>	Confidential P00207 - Confidential P00217

Exhibit #	Description	Bates #
7	<i>Confidential</i>	Confidential P00218 - Confidential P00225
7	<i>Confidential</i>	Confidential P00235 - Confidential P00241
8	<i>Confidential</i>	Confidential P00331 - Confidential P00349
9	Invoice from U.S. law firm	P00143
10	<i>Confidential</i>	Confidential-00226 – P00234
11	California Secretary of State print-out for Micro 3	P00353
11	<i>Confidential</i>	Confidential- P00313 – Confidential-P00330
12	California Secretary of State print-out for ABBYY USA	P00249
12	<i>Confidential</i>	Confidential-P00464
12	<i>Confidential</i>	Confidential-P00304 – P00306, Confidential-P00310 – P00312, Confidential-P00354 - Confidential- P00370, Confidential-P00374 – P00376
13	<i>Confidential</i>	Confidential-P00199 - Confidential- P00206
14	Copyright application	P00189 – P00192
15	Print out from Network Solutions website for Lingvo.com	P00141 – P00142
15	Print out from Lingvo.com website	P00371 - P00372
16	Search results for “lingvo” from Bing	P00181
16	Search results for “lingvo” from Google	P00182 – P00183
16	Search results for “lingvo” from Yahoo	P00186 – P00187
17	Documents produced by Ectaco, use of internet to advertise Lingvosoft	LS000175
18	Registrants’s USPTO application for Lingvosoft	P00403 – P00408
19	Russian court ruling	P00115 – P00118
20	Wikipedia print out for Ectaco	P00409 – P00411
21	USPTO Office Action for Lingvo	LS000078 – LS000108

Exhibit #	Description	Bates #
22	Discovery responses from Registrant	P00412 – P00435
23	Coversheet for Lingvosoft expenditures and sales	LS000193
23	<i>Confidential</i>	Confidential- LS000194 – Confidential- LS000233
24	Documents produced by Registrant relating to its first use of Lingvosoft	LS000112 – LS000113, LS000114 – LS000125, LS000126 – LS000192

Date: December 23, 2009

Merit Law Group PC



Roy Ching, Esq.

Attorney for Petitioner ABBYY Software Ltd.

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing **PETITIONER'S EXHIBITS** was served upon counsel for Registrant this 23rd day of December, 2009 by Fedex, addressed as follows:

Anna Vishev
Ostrolenk Faber LLP
1180 Avenue of the Americas
New York, NY 10036
AVishev@ostrolenk.com



Roy Ching, Esq.

EXHIBIT 24

POCKET PC
EDITION



POCKET PC

Dictionaries □ LingvoSoft Gold Talking Dictionary

- Chinese dictionaries • Spanish dictionaries • Russian dictionaries • Polish dictionaries • German dictionaries • French dictionaries
- Other languages dictionaries

Language Study Aids □ LingvoSoft FlashCards

- Spanish learning software • Russian learning software • Polish learning software • German learning software • French learning software
- Other languages learning software

Dictionaries for Travelers □ ECTACO PhraseBook

- Multilingual Travel Dictionary ML11 • Spanish travel software • Russian travel software • Japanese travel software • German travel software • French travel software

Other languages travel software

Machine Translators □ Pocket PROMT

- Pocket PROMT English ⇄ Russian • Pocket PROMT English ⇄ Spanish

Speech Interpreters □ ECTACO Voice Translator

- Japanese translators • Chinese translators • Spanish translators • Russian translators • German translators

Other languages translators

Language Support □ ECTACO Language Support

- ECTACO Language Support Russian for Pocket PC • ECTACO Language Support Polish for Pocket PC • ECTACO Language Support Arabic for Pocket PC

Dictionaries □ LingvoSoft Gold Talking Dictionary

- Spanish dictionaries • Russian dictionaries • Polish dictionaries • German dictionaries • French dictionaries • Other languages dictionaries

Language Study Aids □ LingvoSoft FlashCards

- Spanish learning software • Polish learning software • German learning software • French learning software
- Other languages learning software



PALM OS



SMARTPHONES

Software for MS Smartphone Dictionaries
Software for Sony Ericsson Dictionaries
Travel Software Software for Nokia
Dictionaries Language Study Aids Travel
Software

Dictionaries □ LingvoSoft Gold Talking Dictionary

- Chinese dictionaries • Spanish dictionaries • Russian dictionaries • Polish dictionaries • German dictionaries • French dictionaries
- Other languages dictionaries

Speech Interpreters □ ECTACO Voice Translator

- ECTACO Universal Translator for Windows English ⇄ Spanish/French/German

Machine Translators □ Pocket PROMT

- IdiomaX Translation Suite (English/Spanish/Italian/French/German) Full Text Translator English ⇄ Romanian for Windows • IdiomaX Office Translator (English/Spanish/Italian/French/German)

Handheld Try Outs

- ECTACO Partner EAF430T English ⇄ Arabic ⇄ French Dictionary Software Emulator for Windows • ECTACO Partner EGHu430T English ⇄ German ⇄ Hungarian Translator Software Emulator for Windows • ECTACO Partner EGP430T English ⇄ German ⇄ Polish Translator Software Emulator for Windows



WINDOWS



Dictionaries

LingvoSoft Pocket PC Dictionary software applications give you advanced linguistic solutions. We use the text to speech and speech recognition technologies to make our software fully suit your purposes. These products turn your electronic device into effective and reliable tools for translation and foreign language learning. More information about Dictionaries Machine



Translators

The Pocket PC machine translation system is here to cut down on your work load! Use our Language Translation Software to translate paragraphs and even large documents. The Prompt application will process documents in sheer seconds. Use our Full Text Translation Software to get coherent and readable texts. More information about Machine

Translators Language Study Aids

This Pocket PC software category includes Accent Removers, tutors and other language learning software titles. These programs will help you achieve flawless English pronunciation. Memorize words and work on your spelling, have an easy time learning, enjoy the friendly language study aids we have developed for you, make use of the ECTACO memorization games, progressive learning techniques and self tests.



Study Aids Speech Interpreters

This Pocket PC software application features our remarkable Speech Recognition engine - the most advanced technology enabling your device to carry out the voice recognition function, i.e. to understand texts pronounced by you and to perform translation tasks with it. Once this software is installed, your device will turn into an advanced voice language translator.

Dictionaries for Travelers

Our Pocket PC Travel Software includes such items as multilingual dictionary software applications and phrasebooks, designed to give you freedom in communicating when going abroad. These products are perfect companions for those who travel a lot. With our travel dictionaries your international travel will be pleasant and worry-free.



Language Support


Localization software includes Ectaco Language Support, the tool for Pocket PC localization, and bundles of translation software for a variety of featured languages - Linguistic Offices. The localization system was developed for Pocket PC and allows you to input texts, use Pocket PC applications, and communicate with the Pocket PC in your native language.



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www.lingvosoft.com

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- Security policy


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The ability to pronounce words in two languages is the distinguishing feature of this software translator. You don't have to check the transcription, merely select a word and with one touch make the speech synthesizer pronounce it for you. The synthesizer (Text-to-Speech engine) is built on innovative formant synthesis, which creates vocal simulations by modeling the sounds of natural human tongue.

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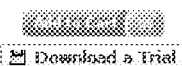
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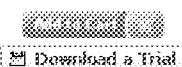
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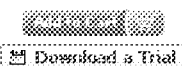
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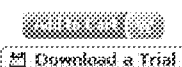
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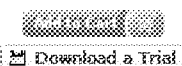
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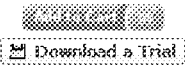
English <-> Japanese Talking Dictionary for Pocket PC provides bidirectional word translation and speech synthesis.

The new English <-> Japanese dictionary is an extensive language resource. It includes three dictionaries based on three different Japanese writing systems:

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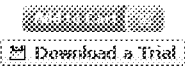
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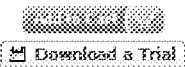
ECTACO English <-> Arabic Talking Partner Dictionary for Pocket PC

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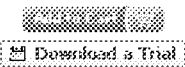


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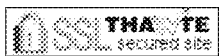
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By Language

- Albanian
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- Arabic
- Japanese
- Armenian
- Korean
- Azeri
- Latin
- Bosnian
- Latvian
- Bulgarian
- Lithuanian
- Chinese Simpl.
- Norwegian
- Chinese Trad.
- Persian(Farsi)
- Croatian
- Polish
- Czech
- Portuguese
- Danish
- Romanian
- Dutch
- Russian
- English
- Serbian
- Estonian
- Slovak
- Finnish
- Slovenian
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
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ECTACO Dictionary English <->

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
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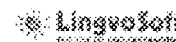
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If you are eager to explore the world and understand its diversity, if you have your mind set on learning human languages, and if you understand the power of effective communication, then you've come to the right place! Travelers, businesspeople and language learners cannot help appreciating the wealth of resources LingvoSoft has to offer.

Implementing superb word databases and supporting over 45 languages, LingvoSoft applications have become the de facto standard in working with languages. High quality, effectiveness, and use of the latest technologies set LingvoSoft software apart from the rest of the field. Moreover, we bring you top translation and localization software by other renowned developers.


We all know the joy of being understood. We also know that to understand something means to be able to describe it. Enjoying happiness and harmony is closely interconnected with comprehending the world and the people around. With this concept in mind, LingvoSoft gives you the means to communicate freely. Our software runs on all standard operating systems, such as Pocket PC, Palm OS, Windows, and various Mobile Phone platforms.

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