

ESTTA Tracking number: **ESTTA379852**

Filing date: **11/22/2010**

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

Applicant:	<b>Cohen, Cariel</b>
Application Serial Number:	<b>85050802</b>
Application Filing Date:	<b>05/28/2010</b>
Mark:	<b>NURU GEL</b>
Date of Publication	<b>10/26/2010</b>

## First 90 Day Request for Extension of Time to Oppose for Good Cause

Pursuant to 37 C.F.R. Section 2.102, NURU (THAILAND) CO., LTD., 31/74 SOI LADPRAO 23, RATCHADAPISEK RD., CHANDRAKASEM, CHATUCHAK, BANGKOK, 10900, THAILAND, a corporation organized under the laws of THAILAND, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good cause is established for this request by:

- *This request is related to "Request for extension of time to file notice of opposition, Tracking No: ESTTA379722 and ESTTA379846" We would like to request for "90-day extension of time to oppose" because we are now have valid evidences which can be filed within 30 days from now but we would like to have more time to file more valid evidences which need time more than 30 days to be prepared to support our right on the opposition. For example, the advertising evidences of Nuru mark in more than 20 massage parlors in Thailand with their authorized signature to certify the evidences, the photos in the marketing event of Nuru mark in Thailand and the shipping document of Nuru Gel products to the United States and other countries. This is to protect our right and to ensure that The ESTTA Board has all information and evidences for making an accurate final decision on our opposition. Our company, NURU (THAILAND) CO., LTD. is now the Manufacturer and Exclusive Global Distributor of Nuru Gel products located in Thailand. We have established the Nuru Gel products distribution in Thailand since 2009 by persons and the company was registered this year. We have started export the Nuru Gel products to global market this year and the first shipment for export was arranged in March 2010. The first shipment to our customer in the United States was arranged in March 2010 as well which we have the evidences to show this prior use in the United States. For more information about the trademark applicant, Mr. Cariel Cohen is one of our customer who purchase the Nuru Gel products from us and we arranged the shipment to his address in the United States for him 5 times and the first shipment take place in April 2010. We and our customers in the United States would be damaged by this registration of the mark. In case of our "90-day extension of time to oppose" is not granted, please kindly give us "30-day extension of time to oppose" instead and we will do our best filing all valid required evidences as your regulation and order. Thank you very much. Best regards, NURU (THAILAND) CO., LTD.*

The time within which to file a notice of opposition is set to expire on 11/25/2010. NURU (THAILAND) CO., LTD. respectfully requests that the time period within which to file an opposition be extended until 02/23/2011.

Respectfully submitted,  
/CDDA4-TPPA4/  
11/22/2010

**CHAIMANASUKSRI, CHAIRAT**

**MR.**

**NURU (THAILAND) CO., LTD.**

**31/74 SOI LADPRAO 23, RATCHADAPISEK RD.CHANDRAKASEM, CHATUCHAK**

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