

ESTTA Tracking number: **ESTTA715964**

Filing date: **12/21/2015**

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

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| Applicant: | World Trade Centers Association, Inc. |
| Application Serial Number: | 85473927 |
| Application Filing Date: | 11/16/2011 |
| Mark: | WTC |
| Date of Publication | 10/20/2015 |

60 Day Request for Extension of Time to Oppose for Good Cause

Pursuant to 37 C.F.R. Section 2.102, The Port Authority of New York and New Jersey, 4 World Trade Center, 17th Floor, 150 Greenwich Street, New York, NY 10006, UNITED STATES respectfully requests that he/she/it be granted an additional 60-day extension of time to file a notice of opposition against the above-identified mark for cause shown .

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- The potential opposer needs additional time to confer with counsel
- *The applicant recently filed suit against the potential Opposer in federal court in New York, captioned The World Trade Centers Association, Inc. v. The Port Authority of New York and New Jersey, 1:15-cv-07411-LTS (S.D.N.Y.). The subject matter thereof involves, among other things, allegations regarding the right to use the mark which is the subject of this application and allegations of infringement with respect thereto. The potential Opposer needs additional time to confer with counsel, investigate and consider the matter.*

The time within which to file a notice of opposition is set to expire on 12/19/2015. The Port Authority of New York and New Jersey respectfully requests that the time period within which to file an opposition be extended until 02/17/2016.

Respectfully submitted,
/Michael Geller/
12/21/2015

Michael Geller

DLA Piper LLP

203 North LaSalle Street,Suite 1900

Chicago, IL 60601

UNITED STATES

michael.geller@dlapiper.com, keith.medansky@dlapiper.com, ch.tm@dlapiper.com

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