

IN THE UNITED PATENT & TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL & APPEAL BOARD

TTAB

CENTRAL MFG. CO.  
(a Delaware Corporation)  
P O Box 35189  
Chicago, IL 60707-0189

Opposition No: 91123765

Opposer,

Trademark: HYPERSONIC

vs.

PARAMOUNT PARKS, INC.  
8720 Red Oak Blvd.  
Charlotte, NC 28217

Applicant



07-26-2004

U.S. Patent & TMO/TM Mail Rcpt Dt. #22

Box TTAB/NO FEE

**MOTION FOR AN EXTENSION OF TIME**

NOW COMES the Opposer and requests that the Board grant the Opposer thirty (30) days to respond to Applicant's Memorandum in Opposition to Opposer's Second Summary Judgment Motion, and states as follows:

The Applicant has raised new issues that must be responded to by the Opposer in order for the Board to make a just decision.

The Opposer has been engaged in drafting a Federal Circuit Appeal's brief in Leo Stoller v. Karen Ponce, Appeal No. 04-1305. Secondly, the Opposer is engaged in the testimonial period in the Central Mfg. Co. v. Sutech U.S.A., Inc., Case No. 117,894. The Opposer's representative, Leo Stoller, has the sole responsibility to responding to the pleadings in this case and all the other cases cited herein, including at least thirty other inter-party proceedings before the Board.

Leo Stoller at 3:00 p.m. on Friday, July 23, 2004, telephoned attorney for the Applicant, Lance Koonce. Mr. Koonce said he would not be able to give me a decision today as to whether or not his client would concede to an extension. Mr. Koonce stated that based upon the Opposer's prior conduct in this proceeding, it would be unlikely as to whether his client would agree voluntarily to this extension. Mr. Koonce stated that the responsible party, Mallory Levitt, in-house counsel for the Applicant is out of the office for a week and that Mr.

Koonce would have to locate another in-house representative of the Applicant.

In view of the fact that Applicant's counsel is unable to give the Opposer a stipulation to this request for an extension, the Opposer is requesting that the Board grant this request.

The Opposer respectfully asserts that the Petitioner cannot be prejudiced by this extension and requests that the Board allow the Opposer up until **August 28, 2004** to respond.

By: Leo Stoller

Leo Stoller  
CENTRAL MFG. CO., Opposer  
Trademark & Licensing Dept.  
P.O. Box 35189  
Chicago, Illinois 60707-0189  
773-283-3880 FAX 708 453-0083

Date: July 23, 2004

**Certificate of Service**

I hereby certify that this *Motion for An Extension of Time* is being deposited with the U.S. Postal Service by in an express mail envelope addressed to:

Lacy H. Koonce  
Lance Koonce  
DAVIS WRIGHT TREMAINE LLP.  
1633 Broadway  
New York, NY 10019-6708

Leo Stoller

Leo Stoller

Date: July 23, 2004

**Certificate of Mailing**

I hereby certify that the foregoing *Motion for An Extension of Time* is being deposited with the U.S. Postal Service as First Class Mail in an envelope addressed to:

TTAB/NO FEE  
Assistant Commissioner of Patents and Trademarks  
2900 Crystal Drive  
Arlington, Virginia 22202-3513

Leo Stoller

Leo Stoller

Date: July 23, 2004