

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

Leo Stoller d/b/a
CENTRAL MFG.
P.O. Box 35189
Chicago, IL 60707

TTAB

Opposition No: 91160234

Opposer,

Trademark: AIRFRAME BUSINESS
SOFTWARE, INC.

vs.

Opposition No: 91160234

Airframe Business Software, Inc.
800 Southwood Blvd, Suite 105
Incline Village, NV 89451

Application SN: 78-233,204

Applicant.

TTAB/NO FEE

**REPLY TO OPPOSITION TO MOTION FOR AN EXTENSION OF TIME TO REPLY
TO APPLICANT'S OPPOSITION TO STRIKE AFFIRMATIVE DEFENSES TO
DISMISS APPLICANT'S COUNTER COUNTERCLAIMS UNDER FRCP 12(B) AND
FOR RULE 11 SANCTIONS AND
APPLICANT'S MOTION FOR RULE 11 SANCTIONS**

NOW COMES the Opposer in reply to Applicant said Opposition. The Opposer asserts that it is compelled to file its reply in order for the Board to make a just decision.

The Opposer first requested from the Applicant's counsel Amy Rosevear to stipulate to an extension for the Opposer who has the sole responsibility to respond to about a dozen inter party pleadings all at about the same time and is unable to respond to Applicant said pleading within the time provided. The Applicant has now filed a formal objection to Opposer's first request for an extension of time.

The Opposer also filed for an extension in an other inter party case Central Mfg. Co. v. Premium Products Inc. Opposition No. 91159950. On July 27, 2007 the Board held a telephone conference between the parties in the said Premium Products case with Ms. Karen Kuhike presiding. The Board did grant the Opposer *upon careful consideration* an extension in the Premium case. Likewise the Opposer asserts, respectfully, that good cause to grant an extension exists in this case. Secondly, the Applicant will not be prejudice by the Board granting the said extension.



08-02-2004

WHEREFORE, the Opposer prays that Board issue an order extending to the Opposer 30 days therefrom to respond to Applicant said pleading.

By: _____

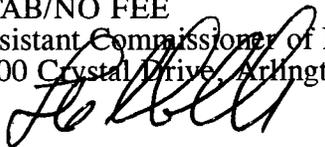

Leo Stoller
CENTRAL MFG., Opposer
Trademark & Licensing Dept.
P.O. Box 35189
Chicago, Illinois 60707-0189
773-283-3880 FAX 708 453-0083

Date: July 30, 2004

Certificate of Mailing

I hereby certify that the foregoing is being deposited with the U.S. Postal Service as First Class Mail in an envelope addressed to:

TTAB/NO FEE
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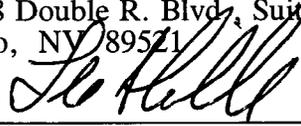


Leo Stoller
Date: July 30, 2004

Certificate of Service

I hereby certify that the foregoing is being sent by U.S. Mail and deposited with the U.S. Postal Service by First Class Mail, in an envelope addressed to:

Ann Rosevear
WALSH, BAKER & ROSEVEAR, P.C.
9468 Double R. Blvd., Suite A
Reno, NV 89521



Leo Stoller
Date: July 30, 2004

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
2900 Crystal Drive
Arlington, Virginia 22202-3513

Mailed: July 27, 2004

Opposition No. 91159950

Central Mfg. Co.

v.

Premium Products Inc.

Karen Kuhlke, Attorney:

On July 27, 2004, at 12:00 pm EDT, the Board held a telephone conference between Jay Spiegel, counsel for applicant, Leo Stoller, pro se for opposer, and the Board attorney responsible for resolving interlocutory matters in this case.

The Board attorney convened the telephone conference upon applicant's request to address the issue of opposer's motion to extend its time to respond to applicant's motion for discovery under Fed. R. Civ. P. 56(f).

Upon careful consideration, the Board finds good cause to grant a limited extension until August 20, 2004.

In view thereof, opposer's response to applicant's motion for discovery under Rule 56(f) is due August 20, 2004.



08-02-2004

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