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Filing date: **10/25/2006**

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

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|------------------------|---|
| Proceeding | 91172562 |
| Party | Defendant ABN AMRO Bank N.V. ABN AMRO Bank N.V. Gustav Mahlerlaan 10 NLX 1082 PP Amsterdam, |
| Correspondence Address | Carol A. Genis Bell, Boyd & Lloyd LLC P.O. Box 1135 Chicago, IL 60690-1135 |
| Submission | Motion to Extend |
| Filer's Name | Kimberly N. Reddick |
| Filer's e-mail | kreddick@bellboyd.com |
| Signature | /knr/ |
| Date | 10/25/2006 |
| Attachments | ABN AMBRO.pdf (3 pages)(67592 bytes) |

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

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|---|---|-------------------------|
| In re Application of |) | |
| |) | |
| ABN AMRO Bank N.V. |) | |
| |) | |
| Appl. No.: 78/482,362 |) | |
| |) | |
| Published: July 4, 2006 |) | |
| |) | |
| Trademark: MAKING MORE POSSIBLE (AND DESIGN) |) | Opposition No. 91172562 |
| |) | |
| Cobra Capital LLC |) | |
| |) | |
| Opposer, |) | |
| v. |) | |
| |) | |
| ABN AMRO Bank N.V. |) | |
| |) | |
| Applicant. |) | |
| |) | |

**APPLICANT’S MOTION TO EXTEND TIME TO RESPOND TO
OPPOSER’S MOTION TO SUSPEND OPPOSITION PROCEEDING
UNTIL 10 DAYS AFTER OPPOSER’S ANSWER IS FILED**

ABN AMRO Bank N.V. (hereinafter “Applicant”), hereby requests that the Board extend the time for Applicant to respond to Cobra Capital LLC’s (hereinafter “Opposer”) “Motion to Suspend Opposition Proceeding in View of Pending Civil Action”, until 10 days after Opposer files its Answer to Applicant’s Counterclaim. Pursuant to TBMP §509.01(a), Applicant’s request is made for good cause as set forth below.

After Opposer filed the Motion to Suspend Opposition Proceeding in View of Pending Civil Action, Applicant on October 10, 2006, timely filed its Answer to the Notice of Opposition and

added a compulsory Counterclaim to cancel the pleaded registration. The Board has not yet acknowledged the Counterclaim and set a date for Opposer to answer.

Until Opposer files its Answer to the Counterclaim, the issues in the pleadings are not joined. Applicant submits there is good cause to alter the timing of Applicant's response to Opposer's motion to suspend, until after the Answer is filed and all pleading issues are joined.

In view of the foregoing, Applicant respectfully requests that the Board promptly acknowledge the filing of the Counterclaim, and grant its request to extend the time to respond to Opposer's Motion to Suspend the Proceedings until 10 days after the filing of Opposer's Answer to the Counterclaim.

Respectfully submitted,
ABN AMRO Bank N.V.

Dated: October 25, 2006

By: 
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CERTIFICATE OF SERVICE

I certify that on this 25th day of October, 2006 a copy of the foregoing APPLICANT'S MOTION TO EXTEND TIME TO RESPOND TO OPPOSER'S MOTION TO SUSPEND OPPOSITION PROCEEDING UNTIL 10 DAYS AFTER OPPOSER'S ANSWER IS FILED was served by first class mail, postage prepaid on:

Gregory J. Vogler, Esq.
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Kimberly N. Reddick