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

Proceeding	91173105
Party	Plaintiff Honda Motor Co., Ltd.
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Submission	Opposition/Response to Motion
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Signature	/s/ Cora Tung Han
Date	12/18/2006
Attachments	Opposer's Response to Motion to Extend.pdf (3 pages)(26482 bytes)

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

In the Matter of Application Serial No. 78/339,571
Published in the Official Gazette of May 30, 2006 at TM 674
MARK: DEALERDASHBOARD
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Honda Motor Co., Ltd.,

Opposition No. 91173105

Opposer,

v.

Michael Dalton,

Applicant.

----------x

OPPOSER'S RESPONSE TO APPLICANT'S SECOND MOTION
TO EXTEND TIME TO FILE ANSWER

Opposer Honda Motor Co., Ltd. ("Opposer" or "Honda") hereby responds to Applicant Michael Dalton's ("Applicant's") Second Motion to Extend Time to file his answer in the above-captioned matter. Applicant's motion should be denied because no good cause exists for an additional extension of time.

On September 27, 2006 Honda filed a Notice of Opposition to Applicant's registration of the trademark DEALERDASHBOARD. On November 5, 2006, Applicant filed a Motion to Extend Time to file his answer, seeking an extension until December 6, 2006. Honda did not oppose this motion. Applicant now seeks a second extension of time to answer, this time until January 6, 2007.

The Board should reject this Second Motion to Extend Time for the following reasons:

- Applicant has already been granted one unopposed extension of time to prepare his answer. Applicant does not present any new grounds for an extension in this motion that he did not already present in his first motion.

- The issues Honda raises in its Opposition are simple: Applicant's DEALERDASHBOARD mark is generic, or at best, merely descriptive, and Applicant has failed to use the mark on all of the goods for which he seeks registration. Applicant should not require an additional extension of time to prepare an answer to these claims.
- The parties are not currently engaged in settlement negotiations, so no additional time is needed for the parties to concentrate on settlement.

Because no good cause exists for a further extension of time, Opposer respectfully requests that the Board deny Applicant's Second Motion to Extend Time to file his answer.

Dated: December 18, 2006

WILMER CUTLER PICKERING
HALE and DORR LLP

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Opposer's Response to Applicant's Second Motion to Extend Time to File Answer has been served on December 18, 2006 by First Class Mail to:

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Box 18137
670 Northland Blvd.
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/s/ Cora Tung Han
Cora Tung Han