

ESTTA Tracking number: **ESTTA147030**

Filing date: **06/21/2007**

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

|                        |  |
|------------------------|--|
| Proceeding             | 91176324   |
| Party                  | Defendant<br>JSK, LLC<br>JSK, LLC<br>593 Providence - New London Turnpike<br>North Stonington, CT 06359  |
| Correspondence Address | Christopher J. Day<br>Law Office of Christopher Day<br>301 East Bethany Home Road, Suite A-213<br>Phoenix, AZ 85012<br>UNITED STATES<br>chris@daylawfirm.com |
| Submission             | Motion to Extend   |
| Filer's Name           | Wayne R. Grohs   |
| Filer's e-mail         | engel@michaud-duffy.com  |
| Signature              | /wrg/  |
| Date                   | 06/21/2007   |
| Attachments            | 1177-0001 request for extension of time.pdf ( 3 pages )(13102 bytes )  |

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

|                                 |   |                         |
|---------------------------------|---|-------------------------|
| BUDGETEL LICENSING CORPORATION, | ) |                         |
|                                 | ) | Opposition No. 91176324 |
| Opposer,                        | ) |                         |
|                                 | ) | Serial No.: 78/239,214  |
| v.                              | ) | Mark: BUDGET INN        |
|                                 | ) | (and design)            |
| JSK, LLC,                       | ) |                         |
|                                 | ) |                         |
| Applicant                       | ) |                         |

Commissioner for Trademarks  
P.O. BOX 1451  
Alexandria, VA 22313-1451

APPLICANT’S MOTION FOR EXTENSION OF TIME

Dear Sir:

Applicant acknowledges the fact that an Answer in the above-identified case was due on April 30, 2007, but that no Answer was filed and that Applicant has been given until June 22, 2007, to show cause why judgment by default should not be entered against Applicant in accordance with Fed. R. Civ. P. 55(b).

In an effort to show just cause why Applicant has not heretofore filed an Answer in this case and why judgment by default should not be entered against Applicant in accordance with Fed. R. Civ. P. 55(b), Applicant respectfully presents that his Attorney, Scott J. Fields, Esq., CEO of the National IP Rights Center, LLC, had passed away. Attorney Fields was hired subsequent to Christopher J. Day, who is listed as the correspondence attorney on the papers of the Opposition.

Notice of Attorney Fields’ death was received by Applicant on April 30, 2007.

The lapse in time between April 30, 2007, and today for filing an Answer is the result of Applicant having to ascertain new counsel and new counsel’s familiarization with this case.

Applicant respectfully requests that the Commissioner accept the foregoing as a reason for just cause as to why Applicant was delinquent in his response to the Trademark Trial and Appeal Board.

Respectfully submitted, this 21st day of June, 2007

By: /s/ Wayne R. Grohs  
Wayne R. Grohs, Esq.  
Richard R. Michaud, Esq.  
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that this APPLICANT'S MOTION FOR EXTENSION OF TIME has been deposited with the United States Postal Service via First Class Mail with postage prepaid addressed to:

James J. Wolfson, Esq.  
GREENBERG TRAURIG  
3290 Northside Parkway, Suite 400  
Atlanta, Georgia 30327

Date: June 21, 2007

/s/ Wayne R. Grohs, Esq.