

ESTTA Tracking number: **ESTTA448539**

Filing date: **12/28/2011**

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

Proceeding	92052621
Party	Defendant American Cigarette Company, Inc.
Correspondence Address	AMERICAN CIGARETTE COMPANY, INC. 1291-B N.W. 65TH PLACE FT. LAUDERDALE, FL 33309 UNITED STATES dspielman@complexip.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Robert C. Kain, Jr.
Filer's e-mail	rkain@complexip.com, dspielman@complexip.com
Signature	/rck/
Date	12/28/2011
Attachments	20111228-mot-ext-time-SJ-Opp.pdf ( 2 pages )(12315 bytes )

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

In the matter of application Serial No. 76/415,303 and 76/415,305

Mark: "UNION GOLD" and "U-UNION and Design"  
Mark UNION Reg. No. 2,972,524

American Cigarette Company, Inc.

Opposer/Respondent/Plaintiff,

v.

N.V. Sumatra Tobacco Trading Company

Applicant/ Petitioner/Defendant.

Opposition Nos. 91185261  
91186841

Cancellation No. 92052621  
(Consolidated)

---

**MOTION FOR EXTENSION OF TIME**

Respondent American Cigarette Company, Inc., hereby files, in accordance with TMBP §528.02 and 37 CFR § 2.127(e)(1), this Motion for Extension of time to file its opposition brief to Petitioner's, N.V. Sumatra Tobacco Trading Company, Motion for Summary Judgment. On December 1, 2011, Petitioner, filed a Motion for Summary Judgment, making Respondent's opposition deadline, December 31, 2011. In light of the holidays and the undersigned's other conflicting case schedules, Respondent needs an additional thirty (30) days to file an appropriate opposition brief.

Counsel for Petitioner was contacted prior to the filing of this Motion and agrees with such requested 30 day extension.

Dated: December 28, 2011

Respectfully submitted,  
Fort Lauderdale, Florida

By: /Robert Kain/  
Robert C. Kain, Jr.  
Reg. No. 30648  
[RKain@ComplexIP.com](mailto:RKain@ComplexIP.com)

Kain & Associates, Attorneys at Law, P.A.  
900 Southeast 3<sup>rd</sup> Avenue, Suite 205  
Fort Lauderdale, Florida 33316  
Telephone: (954) 768-9002  
Facsimile: (954) 768-0158  
Attorney for Opposer American Cigarette Company, Inc.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 28 day of December 2011  
an electronic copy of the foregoing as served via email to the following:

Tara Vold, Esq.  
Fulbright & Jaworski L.L.P.  
801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Tel: 202-662-0200  
Fax: 202-662-4643  
tvold@fulbright.com

/Robert Kain/  
Robert C. Kain, Jr.  
Reg. No. 30648