

ESTTA Tracking number: **ESTTA691589**

Filing date: **08/25/2015**

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

Proceeding	91200183
Party	Plaintiff The Worlds Pageants, LLC and Camila Productions Ltd.
Correspondence Address	THOMAS T AQUILLA AQUILLA PATENTS & MARKS PLLC 221 COE HILL ROAD CENTER HARBOR, NH 03226 UNITED STATES info@aquillapatents.com, docket@aquillapatents.com
Submission	Motion to Extend
Filer's Name	Thomas T. Aquilla
Filer's e-mail	docket@aquillapatents.com
Signature	/Thomas T. Aquilla/
Date	08/25/2015
Attachments	TWP-701L_Mot-Extension.pdf(89304 bytes) TWP-701L_Mot_EXHIBIT-DeclarationA1.pdf(63116 bytes)

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

THE WORLDS PAGEANTS LLC and)	
CAMILA PRODUCTIONS LTD)	
Opposer,)	Opposition No. 91,200,183
)	
)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
v.)	Serial No. 77/753,000
)	Published December 7, 2010
)	
MISS G-STRING INTERNATIONAL, LLC)	
Applicant.)	

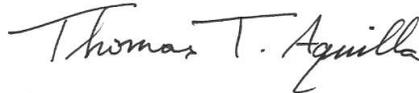
**OPPOSER'S MOTION TO EXTEND TIME
PURSUANT TO FRCP 6(b) AND TBMP § 509**

Opposer The Worlds Pageants, LLC ("TWP" or "Opposer"), by and through its attorney, Thomas T. Aquilla, hereby respectfully submits this Motion to Extend Time and makes of record the following evidence in support of the Motion:

1. Declaration of Thomas T. Aquilla, attorney for Opposer, setting forth with particularity the facts said to constitute good cause for the requested extension (EXHIBIT A1).

In view of the attached Declaration, Opposer respectfully moves the Board to Extend the Time for the filing of Opposer's Trial Brief, due August 25, 2015 by sixty (60) days, or in the alternative a minimum of 30 days. Such relief is respectfully requested.

Respectfully Submitted:



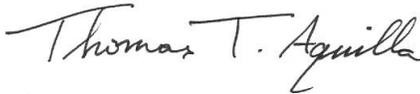
Dated: **August 25, 2015**

By: /Thomas T. Aquilla/

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(603) 253-9474
Aquila Patents & Marks PLLC
221 Coe Hill Road
Center Harbor, NH 03226

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Applicant, Luke Charles Lirot, 2240 Belleair Road, Suite 190 Clearwater FL 33764, on **August 25, 2015**.



Thomas T. Aquilla, Esq.

EXHIBIT A1

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

THE WORLDS PAGEANTS LLC and)	
CAMILA PRODUCTIONS LTD)	
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**OPPOSER'S MOTION TO EXTEND TIME
DECLARATION OF THOMAS T. AQUILLA**

I, Thomas T. Aquilla, hereby declare and say as follows:

1. I am the attorney of record for Opposer in the above-captioned proceeding.
2. My wife, Elizabeth Aquilla, was my office assistant, until she began battling breast cancer almost five years ago.
3. This winter the cancer advanced significantly resulting in stage IV metastatic breast cancer.
4. The tumors are numerous, inoperable, in virtually all tissues and the doctors have discontinued all treatments, except for palliative care.
5. She has not been able to eat anything for over two weeks and yesterday was hospitalized for hydration and electrolytes, and additional palliative care.
6. While caring for my wife and children during this time, I have been practically unavailable to work and have been able to meet only my clients' most urgent needs.

7. Under these circumstances, I have not had sufficient time to prepare the Trial Brief for this case.
8. I believe the foregoing facts demonstrate good cause for the requested Extension.
9. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Date: August 25, 2015

/Thomas T. Aquilla/

Thomas T. Aquilla