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

Proceeding	91205687
Party	Plaintiff David D'Amato
Correspondence Address	ANTHONY N ELIA THE LAW OFFICE OF ANTHONY N ELIA PC 74 TRINITY PLACE SUITE 1609 NEW YORK, NY 10006 UNITED STATES anthony@anelaw.com
Submission	Motion to Extend
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Date	04/15/2013
Attachments	Motion For Extension of Time (2).pdf (3 pages)(214064 bytes)

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

In the Trademark Opposition of:)
Mark: ORLANDO SOLAR BEARS)
Serial No. 85421579) Opposition No.: 91205687
Filed: June 19, 2012)
Published: February 21, 2012) Date: April 15, 2013
)
DAVID D'AMATO,)
Opposer,)
)
vs.)
)
ECHL, INC.,)
Applicant)

**APPLICANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
OPPOSER'S SECOND REQUEST FOR DOCUMENTS**

Opposer, David D'Amato pursuant to Trademark Trial & Appeal Board Manual of Procedure §§ 403.04, 509 and 509.01(a) and 37 CFR §2.120 (a)(2) hereby moves for an extension of time to extend the closing date of discovery. In support of its motion, Opposer submits:

1. That the previous counsel's power of attorney has been revoked and a new power of attorney has been filed appointing new counsel;
2. The extension of time is not to delay but to allow Opposer's new counsel to gather and review all documents and answer any outstanding discovery requests;

Therefore, Applicant prays that:

1. An extension of time be granted for extending the closing date of discovery;

That Opposer have an additional forty-five (45) days up to and including May 24, 2013 to provide adequate time for Opposer's new counsel to gather and review all documents and to answer any outstanding discovery requests.

This the 15th of April, 2013.

Respectfully submitted,

Kloss, Stenger & LoTempio

s/Vincent G. LoTempio/

Vincent G. LoTempio

New York Bar No.

Member New York Bar

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by First Class Mail on this date.

Respectfully submitted,
s/Vincent G. LoTempio/
Vincent G. LoTempio
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April 15, 2013