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Filing date: **12/19/2014**

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

Proceeding	91211873
Party	Defendant Green Ivy Holdings LLC
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Submission	Motion to Extend
Filer's Name	Linda Socolow
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Signature	/Linda Socolow/
Date	12/19/2014
Attachments	Applicant's Motion for Enlargement of Time No. 91211873.pdf(23715 bytes)

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

GREEN IVY EDUCATIONAL
CONSULTING, LLC,

Opposer,

-against-

GREEN IVY HOLDINGS LLC,

Applicant.

OPPOSITION NO: 91211873

Serial Nos.: 85775379, 85775380, and
85775382

Marks: GREEN IVY, GREEN IVY
SCHOOLS, and GREEN IVY LEARNING

**APPLICANT'S MOTION FOR ENLARGMENT OF TIME, OR IN THE
ALTERNATIVE TO REOPEN TIME, TO FILE BRIEF IN RESPONSE TO MOTION
FOR RECONSIDERATION**

Applicant, Green Ivy Holdings LLC ("Applicant"), hereby requests an extension to and including December 23, 2014 to respond to Plaintiff's Request for Reconsideration (D.E. 17), and states:

The Request for Reconsideration was filed by Opposer on November 26, 2014 and the certificate of service thereto reflects that it was mailed via first class mail to counsel for Applicant on that same date. For reasons unknown, the Request for Reconsideration was not received by undersigned counsel until December 9, 2014. Applicant is requesting a short extension of time, or, alternatively, to reopen the time in which to respond, to and including December 23, 2014, to respond to the Request for Reconsideration. Granting this motion poses no prejudice to the Opposer as the delay has not resulted in the loss or unavailability of evidence or witnesses and the requested extension will not otherwise delay the prosecution of this matter as the requested reopening is to the time to respond to a motion for reconsideration and is not directed the trial deadlines in this matter. Moreover, the length of delay is minimal, consisting of only a few days. The neglect, if any, is excusable as it is unknown why it took thirteen days for

the Request for Reconsideration to arrive at the undersigned's desk. Finally, this Motion is not made for the purposes of delay or for any other improper purpose.

Applicant has contacted Opposer regarding the relief sought herein, Opposer opposes the relief sought herein.

WHEREFORE, Applicant requests the Board enter an Order extending its time to respond to the Request for Reconsideration to and including December 23, 2014, and for such other and further relief as deemed appropriate.

Dated: December 18, 2014

SHUTTS & BOWEN LLP
Counsel for Applicant
Green Ivy Holdings LLC
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561-835-8500(ph)/561-650-8530(fax)

By: /s/ Daniel J. Barsky

Daniel J. Barsky
Florida Bar No. 25713

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 18th day of December, 2014, via e-mail and United States First Class Mail, postage prepaid, on:

Mark Lerner, Esq.
Jennifer Philbrick McArdle, Esq.
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 /s/ Daniel J. Barsky
Daniel J. Barsky