

ESTTA Tracking number: **ESTTA664575**

Filing date: **04/02/2015**

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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Date	04/02/2015
Attachments	Motion.pdf(22793 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 UNOPPOSED MOTION FOR ENLARGMENT OF TIME

Applicant, Green Ivy Holdings LLC (“Applicant”), hereby requests an extension to and including April 6, 2016 to respond to Opposer’s Motion for Sanctions, filed on March 6, 2015 (D.E. 24), and states:

Opposer filed and served, via U.S. Mail only, Opposer’s Motion for Sanctions on March 6, 2015. Pursuant to TBMP 502.02(b), a response to the Motion for Sanctions is due on March 26, 2015. The Board previously granted an additional extension of time, with Opposer’s consent, to and including April 2, 2015 due to undersigned counsel having been in trial when the Motion for Sanctions was served. Applicant has been working diligently to respond to the Motion, but requires two additional days to complete its response. Therefore, Applicant requests an enlargement of time to respond to the Motion for Sanctions to and including April 6, 2015.

Counsel for Applicant and Opposer spoke via telephone regarding the relief sought in this motion. Opposer has no opposition to the relief sought herein.

WHEREFORE, Applicant requests the Board enter an Order extending its time to respond to Opposer’s Motion for Sanctions to and including April 6, 2015, and for such other and further relief as deemed appropriate.

Dated: April 2, 2015

SHUTTS & BOWEN LLP
Counsel for Applicant
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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 2nd day of April, 2015, via e-mail and United States First Class Mail, postage prepaid, on:

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 /s/ Daniel J. Barsky
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