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Filing date: **08/27/2014**

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

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|------------------------|--|
| Proceeding | 91213328 |
| Party | Defendant Thomas Brian Bencivengo |
| Correspondence Address | TERRENCE A OVED OVED & OVED LLP 401 GREENWICH STREET NEW YORK, NY 10013-2326 UNITED STATES dyedid@ovedlaw.com, terry@ovedlaw.com, aaron@ovedlaw.com |
| Submission | Stipulated/Consent Motion to Reopen |
| Filer's Name | David Yedid, Esq. |
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| Signature | /David Yedid/ |
| Date | 08/27/2014 |
| Attachments | Motion to Reopen time to Answer.pdf(234329 bytes) |

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

In the Matter of Application Serial No. 85/635,478
Published in the Official Gazette on May 7, 2013
Mark: NO. 7

USS SEADRAGON LLC,

Opposer,

v.

THOMAS BRIAN BENCIVENGO,

Applicant.

Opposition No. 91213328

CONSENT MOTION TO REOPEN TIME PERIOD TO ANSWER

Applicant, Thomas Brian Bencivengo (“Applicant”), by and through his attorneys, Oved & Oved LLP, hereby respectfully requests the Trademark Trial and Appeal Board (the “Board”) to reopen the time period to answer Opposer’s Notice of Opposition, dated November 4, 2013 (the “Opposition”), in the instant proceeding, and extend same 60 days, to October 27, 2014, on consent.

The parties hereto are presently in the process of negotiating a settlement of this proceeding.

Opposer, USS SeaDragon LLC (“Opposer”), has granted consent to reopen and extend Applicant’s time to answer, move or otherwise respond to the Opposition for 60 days due to the continued negotiations between the parties.

Accordingly, Applicant, with the consent of Opposer, moves to reopen the time period to answer the Notice of Opposition and extend same for 60 days, to October 27, 2014.

WHEREFORE, the Applicant respectfully requests that the Board extend the deadline to Answer and all subsequent deadlines for 60 days from the date of the Board's order.

Dated: August 27, 2014
New York, New York

Respectfully submitted,

/David Yedid/

David Yedid, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2014, a true and complete copy of Applicant's forgoing *Consent Motion to Reopen Time Period to Answer* has been served on Opposer's counsel, Charles G. Zug, Esq., via email (with consent for electronic service), to the following email address:

Charles G. Zug, Esq.
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/David Yedid/
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