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

Proceeding	91219513
Party	Defendant Dr. Shirley Ross
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Submission	Other Motions/Papers
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Date	02/01/2015
Attachments	motion to reopen - BOOKS TO GIVE.pdf(212263 bytes )

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

BFF Biz, LLC	)	Opposition No.: 91219513
	)	
Plaintiff/Registrant,	)	
	)	
vs.	)	
	)	
Shirley Ross	)	
	)	
Defendant/Applicant	)	
	)	
	)	
	)	

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**MOTION TO REOPEN**

Defendant Shirley Ross, (“Defendant” or “Applicant”), through her attorney, Anthony M. Verna III, hereby files this Motion to Reopen.

**I. Facts**

Applicant believed to have been discussing settlement with the Plaintiff.

**II. The Standard of a Motion to Reopen**

A party moving to extend time must demonstrate that the requested extension of time is not necessitated by the party’s own lack of diligence or unreasonable delay in taking the required action during the time previously allotted therefor. See TBMP § 509.01 (2d ed. rev. 2004).

The parties had discussed the differences and similarities between goods/services and consumers.

Respectfully submitted,

Dated: February 2, 2015

/s Anthony M. Verna III  
Anthony M. Verna III, Esq.  
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