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

Proceeding	91220573
Party	Defendant Linda Grandia
Correspondence Address	LINDA GRANDIA G & G EXCHANGE KEPPLERSTREET 13 AMERSFOORT, 3817TA NETHERLANDS info@missmultiverse.com
Submission	Opposition/Response to Motion
Filer's Name	Linda Grandia
Filer's e-mail	info@missmultiverse.com
Signature	/Linda Grandia/
Date	04/06/2016
Attachments	Defendants answer to Plaintiffs motion to joint opposers.pdf(111367 bytes)

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

In re: Application Serial No. 86/235,052
Mark: MISS MULTIVERSE

MISS UNIVERSE L.P., LLLP,)	Opposition No. 91220573
)	
Opposer,)	
)	
v.)	
)	
LINDA GRANDIA,)	
)	
Applicant.)	

_____)

DEFENDANTS RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION JOINT PARTY

Amersfoort, The Netherlands, Tuesday, April 5, 2016

On the 21st of March 2016 MISS MULTIVERSE (“Defendant”) was served with a copy of Miss Universe L.P., LLLP. (“Plaintiffs”) Motion to Join Parties, pursuant to § TBMP 512 requesting that IMG Universe, LLC be joined as named Opposer in the foregoing proceeding.

In due time under rule 37 CFR 2.119(c) Defendant hereby responds and does not dispute Plaintiffs Motion to Join Parties under Rule §TBMP 512 but does oppose party’s duty to cooperate and that includes disclosure of discoverable information that is relevant to the foregoing proceedings under rule §TBMP 408. Opposing party has withheld information since September 2015, meaning such information could have been provided during the disclosure period and early stages of discovery pursuant to §TBMP 403.05. The untimely disclosure of the subject matter results in substantial alterations that puts Defendant on a disadvantage to the extend that Defendant has not included discovery questions related to IMG Universe, LLC and is unable to properly prepare Defendants case before the board.

CONCLUSION

For the foregoing reasons, the Defendant respectfully requests an additional sixty-day extension of time pursuant to §TBMP 509.01(a) To Allow Time for "Follow-up" Discovery and to Facilitate Introduction of Produced Documents pursuant to §TBMP 403(a)

Certificate of Service

*I hereby certify that a true and complete copy of the attached foregoing (**Early Discovery Document - Miss Multiverse Trademark**) has been served upon opposing counsel (Amy Gaven of Kelley Drye & Warren LLP) by e-mail (on December April 5, 2016 to e-mail address: agaven@kelleydrye.com) and mailing said copy, via First Class Mail, postage prepaid to: (Amy Gaven, Kelley Drye & Warren LLP, 101 Park Avenue, New York, 10178, United States).*



Handwritten signature: Linda Grandia
Circular postmark: MISS & MRS MULTIVERSE GG EXCHANGE

Dated: _____ Tuesday, April 5, 2016

By: _____
Linda Grandia **Applicant**

Respectfully submitted,

/Linda Grandia/

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