

ESTTA Tracking number: **ESTTA678329**

Filing date: **06/16/2015**

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

Proceeding	91221843
Party	Defendant Merve Optik Sanayi Ve Ticaret Anonim Sirketi
Correspondence Address	DESTEK PATENT ANONIM SIRKETI LEFKOSE CAD NM OFISPARK B BLOK NO 36/5 BURSA, TURKEY trademarks@destekpatent.com.tr
Submission	Motion to Extend
Filer's Name	John S. Egbert
Filer's e-mail	mail@egbertlawoffices.com
Signature	/1285-843/
Date	06/16/2015
Attachments	1285-843 Mtn to Extend Answer.MUSTANG.pdf(10210 bytes)

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

In the Matter of Application Serial No. 79/104,357
Published in the Official Gazette on January 6, 2015

Ford Motor Company,	§	
	§	
Opposer,	§	
	§	
v.	§	Opposition No. 91221843
	§	
Merve Optik Sanayi Ve Ticaret	§	
Anonim Sirketi,	§	
	§	
Applicant.	§	

APPLICANT'S MOTION TO EXTEND TIME TO FILE ANSWER

Pursuant to TBMP §310.03(c), Merve Optik Sanayi Ve Ticaret Anonim Sirketi ("Applicant"), by its attorneys, hereby moves the Trademark Trial and Appeal Board ("TTAB") for a forty (40) day extension of time to file an answer or other initial responsive pleading to Ford Motor Company's ("Opposer") Notice of Opposition, and to reset the discovery deadlines, trial dates, and other dates in this proceeding accordingly, because there is good cause for Applicant's delay in filing its Answer or appearing in this proceeding by the June 16, 2015 due date.

The Applicant has sought counsel to represent it in this Opposition, and Egbert Law Offices, PLLC was just contacted this morning with the request that an Answer to the Notice of Opposition in the present proceeding be filed by the June 16, 2015 due date, which is today. Complicating matters, Tropical Storm Bill is currently located in the Gulf of Mexico, and the storm is expected to make landfall by 11:00 am today. Egbert Law Offices, PLLC is located in Houston, and Houston is expected to see substantial flooding as a result of the tropical storm. There has been a whirlwind of activity within the office in an effort to attend to client matters prior to any office closures that

may occur. Therefore, newly appointed counsel for the Applicant requires more time in order to prepare a proper response to the Opposer's Notice of Opposition.

Applicant is filing this Motion to Extend in order to provide counsel for the Applicant ample time to prepare an appropriate response and to prevent the entry of default against it due to the failure to file an Answer or other initial responsive pleading.

Based upon the above reasons, Applicant respectfully requests the Board grants its request for a forty (40) day extension of time to file an Answer or other initial responsive pleading, and to reset the discovery dates, trial dates, and remaining dates in this proceeding accordingly.

Respectfully submitted,

June 16, 2015
Date

/1285-843/
John S. Egbert
Reg. No. 30,627
Kevin S. Wilson
Michael F. Swartz

Egbert Law Offices, PLLC
1314 Texas, 21st Floor
Houston, Texas 77002
(713)224-8080
(713)223-4873 (Fax)

ATTORNEYS FOR APPLICANT
Merve Optik Sanayi Ve Ticaret Anonim Sirketi

