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

Proceeding	92050920
Party	Defendant Milena Soni
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Submission	Motion to Extend
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Date	08/12/2011
Attachments	Motion_Extension_Time_Respondents_Trial_Brief_(12AUG11).pdf (4 pages) (21323 bytes)

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

In re Registration No.3,009,990

Trademark: ENTELLECT
Registered: November 1, 2005

INTELLECT TECHNICAL)	
SOLUTIONS, INC.)	
)	
Petitioner,)	CANCELLATION NO.: 92050920
v.)	
)	
MILENA SONI)	
)	
Respondent.)	
_____)	

**RESPONDENT’S MOTION FOR EXTENSION
OF TIME TO FILE RESPONDENT’S TRIAL BRIEF**

Petitioner Intellect Technical Solutions, Inc. (“Petitioner”) filed a Trial Brief for Petitioner on July 15, 2011. Respondent Milena Soni (“Respondent”) hereby moves the Board for a four (4) week extension of time to file its Trial Brief (currently due August 15, 2011) until September 12, 2011.

Pursuant to Fed. R. Civ. P. 6(b), made applicable to Board proceedings by 37 C.F.R. § 2.116(a), a party may file a motion for an enlargement of the time in which an act is required or allowed to be done prior to the expiration of the period

as originally set or previously extended, and the moving party need only show good cause for the requested extension. TBMP 509.01.

The requested extension is not necessitated by Respondent's own lack of diligence or unreasonable delay. Respondent respectfully submits that the requisite good cause for an extension to respond exists in the current matter since Respondent's lead counsel, Surjit P. Soni, will be traveling and out of Los Angeles from August 13, 2011 until August 24, 2011 and will be unavailable to prepare a response by August 15, 2011.

Respondent would be prejudiced if an extension of time is not granted by the Board, because Respondent would be deprived of the opportunity to adequately address the issues raised in Petitioner's Trial Brief. Petitioner will not suffer any prejudice from the extension other than a minor delay to file its Reply Brief, which is not an undue burden.

On August 12, 2011, counsel for Respondent sent an email to and left voice mail messages for counsel for Petitioner requesting consent to this Motion; however, at the time of this filing, counsel for Petitioner has not responded.

For the foregoing reasons, Respondent respectfully requests the Board to grant an extension to file its Trial Brief on September 12, 2011.

Dated: August 12, 2011

By: /Ronald E. Perez/
Surjit P. Soni
Ronald E. Perez
Attorneys for Respondent,
Milena Soni

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing document entitled **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S TRIAL BRIEF** was served upon the Petitioner via email transmission and USPS First Class Mail on this 12th day of August 2011, as follows:

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/Ronald E. Perez/

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