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

Proceeding	92052146
Party	Plaintiff Corporacion Habanos, S.A. and Empresa Cubana del Tabaco, d.b.a. Cubatabaco
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Submission	Stipulated/Consent Motion to Extend
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Date	06/08/2010
Attachments	consent motion to extend.pdf (3 pages)(20905 bytes)

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

CORPORACION HABANOS, S.A., and EMPRESA)	
CUBANA DEL TABACO, d.b.a. CUBATABACO,)	
)	
Petitioners,)	
)	
v.)	Cancellation No. 92052146
)	
RODRIGUEZ, JUAN E.,)	
)	
Registrant.)	
)	

**CONSENT MOTION TO EXTEND TIME TO OPPOSE REGISTRANT’S MOTION TO
DISMISS UNDER RULE 12(b)(1) and 12(b)(6)**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), 37 C.F.R. § 2.116(a), and TBMP § 509, and with the consent of Registrant, Petitioners CORPORACION HABANOS, S.A. (“Habanos, S.A.”) and EMPRESA CUBANA DEL TABACO (“Cubatabaco”) (together “Petitioners”), by and through their undersigned counsel, move to extend the time to oppose Registrant’s motion to dismiss under Rule 12(b)(1) and 12(b)(6), from June 10, 2010 to June 24, 2010, and in support thereof state as follows:

1. Following two extensions on consent, Registrant filed its motion to dismiss on May 21, 2010, which it served by mail that day, making Petitioners’ opposition due on June 10.
2. Since receiving the motion on May 24, undersigned counsel for Petitioners has been involved in a series of filings in unrelated matters, including a Second Circuit brief filed on June 4, two briefs due at the Board this week, and three briefs due in a case in Federal Court in Washington, D.C. on June 14, June 22, and June 24. Because of my schedule, another attorney in my office, who was also substantially involved in preparing the Second Circuit brief, is assisting me in this matter, but will be out of the country on business all next week.

3. Petitioners' counsel has been working diligently to prepare the opposition, but the schedules necessitate the extension request. This request is made in good faith, and not to delay the proceeding, and for good cause.

4. Undersigned counsel has spoken with Registrant's counsel, who has consented to this request both by phone and email.

WHEREFORE, good cause having been shown, Petitioners respectfully request that this motion to extend the time to oppose Registrant's motion to dismiss under Rule 12(b)(1) and 12(b)(6), from June 10, 2010 to June 24, 2010, be granted.

Dated: June 8, 2010

Respectfully submitted,

/David B. Goldstein/
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*Attorneys for Petitioners Corporacion Habanos,
S.A. and Empresa Cubana del Tabaco*

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Consent Motion To Extend Time To Oppose Registrant's Motion To Dismiss Under Rule 12(b)(1) And 12(b)(6) was served on Registrant by U.S. first class mail, postage prepaid, on June 8, 2010 upon:

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Attorneys for Registrant

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