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

Proceeding	92053509
Party	Defendant CampusEAI Consortium
Correspondence Address	MICHAEL C DEJOHN 1111 SUPERIOR AVENUE, SUITE 310 CLEVELAND, OH 44114 UNITED STATES michael_dejohn@campuseai.org
Submission	Motion to Extend
Filer's Name	Michael C. DeJohn
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Signature	/s/ Michael C. DeJohn
Date	03/12/2012
Attachments	motion.enlargement (3 12 12).pdf ( 4 pages )(91315 bytes )

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

<b>CLEVELAND STATE UNIVERSITY</b>	)	<b>CANCELLATION No. 92053509</b>
	)	
<b>Petitioner,</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>CAMPUSEAI CONSORTIUM</b>	)	<b><u>REGISTRANT'S MOTION FOR</u></b>
	)	<b><u>ENLARGEMENT OF TIME TO FILE A</u></b>
<b>Registrant.</b>	)	<b><u>RESPONSE TO PETITIONER'S</u></b>
	)	<b><u>ALTERNATIVE MOTION FOR</u></b>
	)	<b><u>DISCOVERY SANCTIONS IN THE</u></b>
	)	<b><u>FORM OF JUDGMENT</u></b>

NOW COMES CampusEAI Consortium, Registrant, by and through undersigned counsel, and hereby respectfully submits its Motion for Enlargement of Time to File a Response to Petitioner's Alternative Motion for Discovery Sanctions in the Form of Judgment.

Registrant is requesting this Enlargement so that it has sufficient time to gather the evidentiary proof necessary to respond to the allegations and arguments of law that Petitioner has put forth in their combined motion. Attached hereto as Exhibit A and incorporated herein is an affidavit from Arun Kumar Chopra stating that Registrant requires additional time to locate documents, agreements, and other tangible items that would aid Registrant in responding to Petitioner's instant motion.

This Board has already set a deadline date of March 27, 2012 for Registrant to file a response to Petitioner's Motion for Leave to Amend. Registrant is hereby respectfully requesting until March 27, 2012 to file a response to file a response to Petitioner's

Alternative Motion for Discovery Sanctions in the Form of Judgment as well. Registrant has requested ZERO continuances in this matter for a total amount of ZERO days thus far. This request is being made in good faith and not interposed for delay or any unjust reasons.

Respectfully submitted,

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*Counsel for Registrant*

**CERTIFICATE OF SERVICE**

I hereby certify that this File a Response to Petitioner's Alternative Motion for Discovery Sanctions in the Form of Judgment was electronically filed with the United States Patent and Trademark Office, Trademark Trial and Appeal Board on March 12, 2012 and that copy of the foregoing was served via e-mail on Petitioner's below counsel:

Colleen F. Gross, Esq.  
cfgoss@faysharpe.com  
*Counsel for Petitioner*

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Michael C. DeJohn (0077227)

STATE OF CUYAHOGA

:

ss **AFFIDAVIT**

COUNTY OF OHIO

:

I, the undersigned, Arun Kumar Chopra, being of legal age, sound mind and memory, and having been duly sworn according to law do hereby depose and state that:

1. This Affidavit is made upon my personal knowledge and information.
2. I am the CFO of CampusEAI and the person with the most knowledge about the dealing of the University of Cleveland.
3. I was the person who supplied the answers to Petitioner's First Set of Interrogatories and Request for Production of Documents.
4. I have recently discovered additional information, documents, and or other tangible items that will need to be supplemented to the Answers previously produced.
5. I need additional time to locate and aggregate this information and/or documentation so that CampusEAI can respond to Petitioner's motion for judgment.

**FURTHER AFFIANT SAYETH NAUGHT.**



\_\_\_\_\_  
Arun Kumar Chopra

Sworn to and subscribed before me, a duly authorized Notary Public, in and for the State of Ohio, on this 12th day of March, 2012.



\_\_\_\_\_  
NOTARY PUBLIC

Michael C. B. Smith, Sec  
ORC 147.03