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

Proceeding	92054050
Party	Defendant Unimundo Corp dba Unimundotv
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Submission	Motion to Extend
Filer's Name	Marcus Fontain
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Date	03/13/2014
Attachments	Unimundo's Motion for Extension of Time to Hire Counsel.pdf(203951 bytes)

UNIMUNDO hereby requests a sixth (60) day extension of time to retain legal counsel and in Support of this Motion, UNIMUNDO sets forth the following grounds:

I

INTRODUCTION

Since the inception of the first cancellation proceedings instituted by Petitioner Univision against the mark UNIMUNDO; UNIMUNDO has been representing itself through its President Marcus Fontain, J.D., in pro se.

However, as of late Univision has filed yet another cancellation proceeding only this time against UNIMUNDO.COM, as well as another barrage of bullying papers.

Now, Univision, at this late date, is unfairly and unjustifiably further seeking to consolidate both cancellation proceedings, UNIMUNDO and UNIMUNDO.COM; which has in fact made the cancellation proceedings and the litigation more complex for UNIMUNDO to continue acting pro se.

Additionally, on more than one occasion the Board strongly recommended that UNIMUNDO retains competent counsel to handle the proceedings before the Board because of the strict rules; to meet the multiple deadlines; follow the rules of procedure and rules regarding evidence of trademark law which are unfamiliar to UNIMUNDO as well as the rules and requirements for appearing before the Board all of which is now becoming more difficult for UNIMUNDO to properly conduct both of the cancellations proceeding without the aid of competent legal counsel while attempting to run the business of UNIMUNDO.

UNIMUNDO has been in consultation with experienced trademark litigation attorneys, however, due to the respective attorney's busy schedules, the pressing

deadlines in these proceedings as well as other related matters is has been difficult to bring an attorney on board.

Therefore, at this time it has become apparent to UNIMUNDO that retaining an experienced counsel will be of benefit to both the Board and to UNIMUNDO. As such UNIMUNDO Moves the Board for a sixty (60) day extension of time to engage counsel.

II

PROCEDURAL BACKGROUND

On May 06, 2011, the Petitioner Univision began the *first* cancellation proceedings against the mark UNIMUNDO: Cancellation No. 92054050; Registration No. 3,889,485; Serial No. 85-003,668.

On October 08, 2013, nearly three (3) years later; Petitioner Univision began yet second cancellation proceedings; against the mark UNIMUNDO.COM: No. 92057999; Registration No. 4, 077,714; Serial No. 85-057,916.

On October 09, 2013, nearly three (3) years later Petitioner Univision filed a Motion for Consolidation of the proceedings of the mark UNIMUNDO: Cancellation No. 92054050 and the mark UNIMUNDO.COM: Cancellation No. 92057999; Registration No. 4, 077,714; Serial No. 85-057,916.

UNIMUNDO has alleged that the only reason why Univision is attempting to consolidate both cancellations is directly related to the failure by Univision to conduct discovery as ordered by the Board.

On February 05, 2014, UNIMUNDO in Opposition to Univision's latest filings filed the following three motions:

1. *"Motion for Default Judgment"* against Univision pursuant to Rule 37(b)(2) of the Fed.R.Civ.Pro.; 37 C.F.R. Section 2.120(g)(1); and Fed.R.Civ.P. Rule 37(b)(2)(A)(vi), for failure to conduct discovery from the order of January 31, 2013 in reference to the mark UNIMUNDO: Cancellation No. 92054050; Registration No. 3,889,485; Serial No. 85-003,668;

2. *"Motion to Dismiss Petition to Cancel the UNIMUNDO.COM Mark for Failure to State a Claim"* pursuant to Fed.R.Civ.Pro. Rule 12(b)(6) in the new Petition for Cancellation of the mark UNIMUNDO.COM: Registration No. 92057999; Registration No. 4, 077,714; Serial No. 85-057,916; and

3. *"Opposition Motion to Petitioner Univision's Motion for Consolidation"* of the UNIMUNDO Cancellation No. 92054050 and the UNIMUNDO.COM Cancellation No. 92057999.

All three Motions are pending further proceedings which will need to be revisited by competent counsel.

III

CONCLUSION

WHEREFORE, UNIMUNDO does hereby requests a sixth (60) day extension of time to retain an attorney to proceed with these cancellations.

Executed on March 13, 2014

Respectfully submitted,



UNIMUNDO Corporation
By and through
Marcus Fontain, J.D.
President and CEO, pro se

PROOF OF SERVICE

I Marcus Fontain, on this date have delivered via U.S. mail a copy of this REGISTRANT UNIMUNDO CORPORATION'S MOTION FOR EXTENSION OF TIME TO RETAIN LEGAL COUNSEL, , addressed to:

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March 13, 2014



Marcus Fontain, J.D.