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

Proceeding	92054050
Party	Plaintiff Univision Communications Inc.
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

UNIVISION COMMUNICATIONS INC.,)	
)	
Petitioner,)	
)	
v.)	Cancellation Nos. 92054050
)	
UNIMUNDO CORPORATION)	
)	
Registrant.)	

**OPPOSITION TO UNIMUNDO’S MOTION FOR
EXTENSION OF TIME**

I. INTRODUCTION

Unimundo’s most recent filing is another attempt by Unimundo to delay these proceedings. The scant allegations in Unimundo’s Motion for an Extension of Time (“Motion”) contradict representations made by Unimundo’s president to the Board under penalty of perjury. The Motion also fails to assert facts sufficient to establish good cause of the extension.

On March 13, 2014, Unimundo filed a motion requesting an extension of time to retain counsel. Univision opposed the motion. On April 10, 2014, the Board held a conference with the parties. Marcus Fontain, President and CEO of Unimundo, appeared on behalf of Unimundo. During the conference, Mr. Fontain represented that he had “reached an agreement with counsel” and only needed a brief extension to allow him to gather the funds necessary for a retainer. (See Board’s Order dated April 14, 2014). Based on these representations, the Board granted Unimundo one final extension through June 30, 2014. Now, Unimundo contends that it did not retain counsel in April – a clear contradiction of what Mr. Fontain told the Board during the parties’ conference. Instead, Unimundo now contends that it retained counsel on June 24, 2014

and thus, should be granted *another* extension. Unimundo's statements are contrary to those made in its earlier briefs and the representations made by Mr. Fontain to the Board on April 10, 2014. There is no basis for Unimundo's request and Unimundo should not be permitted to delay these proceedings any further.

II. AN EXTENSION IS NOT NECESSARY

In the Motion, Unimundo contends that its chosen counsel needs time to conduct "additional research" and to engage in settlement discussions. Yet, the Motion fails to identify the issues that allegedly require "additional research" -- perhaps because none exist.

The statement by Unimundo that it needs more time to engage in settlement discussions is also false. When Unimundo's counsel called Univision's counsel requesting consent to a further extension, there was absolutely no mention of settlement discussions. In fact, Mr. Fontain has repeatedly stated to Univision and to the Board (in its papers and during the April 10 conference) that Unimundo is not open to settlement. Yet, Unimundo's Motion states that it "needs" an extension in order to engage in settlement discussions. In light of all of Unimundo's previous statements, this is hard to believe, to put it mildly.

As explained and discussed during the April 10 conference, Unimundo has had the benefit of counsel since the outset of this proceeding. Unimundo further stated that it had retained counsel in April 2014. Accordingly, no extension is warranted. The Board has extended Unimundo every courtesy thus far. During the April 10 conference, the Board stated that it would not grant Unimundo any more extensions. The Board should stand firm on its ruling and deny Unimundo's most recent request for an extension.

V. CONCLUSION

For the foregoing reasons, Univision Communication Inc. respectfully requests the Board to deny Unimundo's motion for an extension.

Respectfully submitted,

UNIVISION COMMUNICATIONS INC.

Dated: July 9, 2014

By: _____/s/_____
Ellie Hourizadeh
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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing OPPOSITION TO UNIMUNDO'S MOTION FOR EXTENSION upon Registrant by electronic mail, on **July 9, 2014** addressed as follows:

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