

ESTTA Tracking number: **ESTTA668029**

Filing date: **04/22/2015**

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

Proceeding	92057023
Party	Defendant John "Giovanni" Aragona
Correspondence Address	JAMIE N PITTS THE LAW OFFICE OF JAMIE N PITTS 887 West Marietta Street, NWSuite M-105 Atlanta, GA 30318 UNITED STATES jamiempitts@jnplawfirm.com
Submission	Motion to Extend
Filer's Name	Jamie Pitts
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Signature	/Jamie Pltts/
Date	04/22/2015
Attachments	motion to extend.pdf(67655 bytes)

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

In the matter of Trademark Registration No. 4,220,686 Mark:
GIOVANNI'S ALOHA FOODS
Registration date: October 9, 2012

In the matter of Trademark Registration No. 4,224,400 Mark:
GIOVANNI'S SCAMPI MARINADE
Registration date: October 16, 2012

In the matter of Trademark Registration No. 4,232,569 Mark:
GIOVANNI'S ORIGINAL WHITE SHRIMP TRUCK
Registration date: October 30, 2012

In the matter of Trademark Registration No. 4,248,595
Mark: GIOVANNI'S HOT & SPICY WE REALLY MEAN IT! SAUCE
Registration date: November 27, 2012

LuckyU Enterprises, Inc., dba Giovanni's	:	
Original White Shrimp Truck	:	
	:	
Petitioner,	:	
	:	
v.	:	Cancellation No. 92057023
	:	
John "Giovanni" Aragona	:	
	:	
Registrant.	:	

REGISTRANT'S MOTION TO EXTEND

Now comes the Registrant and moves for an order extending the due date to file Registrant's Trial Brief, which is due today April 21, 2015, by three to five days. This request is being made due to damage caused when lightening hit the building I was working in several hours ago, frying the electricity and the electronics that were plugged into the walls, as well as the

computer I have my Trial Brief saved on. I am requesting the extension of three to five days in order to get my computer repaired, or at least be able to recover the brief from the hard drive. Earlier this evening, I contacted Counselors for Petitioner, Daniel Mullarkey and Jennifer Fraser, but I was unable to reach them to request their consent to this brief extension. I will file an updated Motion with the Board as soon as I am able to get in touch with either regarding their consent.

Dated: Tuesday 21, 2015

Respectfully submitted,

/Jamie N. Pitts
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Attorney for Registrant, John "Giovanni" Aragona

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Motion to Extend Due Date for Registrant's Trial Brief

was served on

April 22st 2015

to Petitioner's counsel via first class mail as follows:

Jennifer Fraser

Dan Mullarkey

NOVAK DRUCE CONNOLLY BOVE & QUIGG LLP

1875 Eye Street, N.W.

Eleventh Floor

Washington, D.C. 20006

And via email as follows:

Jennifer.fraser@novakdruce.com

Daniel.mullarkey@novakdruce.com

s/Jamie N. Pitts

Jamie N. Pitts