

ESTTA Tracking number: **ESTTA695997**

Filing date: **09/15/2015**

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

Proceeding	92060029
Party	Defendant Melvin N.A. Avanzado DBA The Avanzado Law Firm
Correspondence Address	ELAINE W YU THE AVANZADO LAW FIRM 1880 CENTURY PARK E, STE 1404 LOS ANGELES, CA 90067 UNITED STATES elaine@avanzadolaw.com, mel@avanzadolaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Elaine Yu
Filer's e-mail	elaine@avanzadolaw.com
Signature	/Elaine Yu/
Date	09/15/2015
Attachments	2015-09-15 Stipulated Consent Motion for Extension to File Responding Brief (Final).pdf(130356 bytes ) 2015-09-15 [Proposed] Order Granting Stipulated Consent Motion to Extend Time (Final).pdf(80619 bytes )

1 **THE AVANZADO LAW FIRM**

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9 Attorneys for Respondent Melvin N.A.  
10 Avanzado

11 UNITED STATES PATENT AND TRADEMARK OFFICE  
12 TRIAL AND APPEAL BOARD

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15 JAHN & ASSOCIATES, a Limited Liability  
16 Corporation,

17 Plaintiff,

18 v.

19 Melvin N.A. Avanzado, an individual,

20 Defendant.  
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CANCELLATION NO. 92060029  
REGISTRATION NO. 4015965

STIPULATED CONSENT MOTION  
TO EXTEND TIME FOR FILING  
RESPONDING BRIEF

Petition filed: September 23, 2014

1 Respondent Melvin N.A. Avanzado (“Respondent”) submits this Stipulated  
2 Consent Motion to Extend Time for Filing Responding Brief to Plaintiff Jahn &  
3 Associates’ (“Plaintiff”) motion for summary judgment (Doc. No. 7). Respondent  
4 respectfully shows the Trademark Trial and Appeal Board (“TTAB”) as follows:  
5

- 6 1. On September 5, 2015, Petitioner filed and served a motion for  
7 summary judgment (Document No. 7).
- 8 2. Respondent’s responding brief to Petitioner’s motion for summary  
9 judgment is due 30 days after service of the motion for summary  
10 judgment on October 5, 2015.
- 11 3. Scheduling conflicts for Respondent have arisen that adversely affect  
12 the October 5, 2015 deadline for Respondent’s responding brief.
- 13 4. Counsel for Petitioner and Respondent have agreed to extend  
14 Respondent’s deadline to file the responding brief to October 12, 2015.  
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17 **WHEREFORE**, Respondent respectfully requests TTAB to enter an order  
18 granting Respondent’s Stipulated Consent Motion to Extend Time for Filing  
19 Responding Brief, and extending the deadline for filing Respondent’s responding  
20 brief to October 12, 2015.  
21

22 DATED: September 15, 2015

**THE AVANZADO LAW FIRM**

MELVIN N.A. AVANZADO  
ELAINE W. YU

By: /s/ Elaine W. Yu

Elaine W. Yu

Attorneys for Respondent  
Melvin N.A. Avanzado

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over  
3 the age of 18 years and am not a party to the within action. My business address is 1880  
4 Century Park East, Suite 1100, Los Angeles, California 90067. On the date set forth below, I  
caused the foregoing document(s) described as

5 **STIPULATED CONSENT MOTION TO EXTEND TIME FOR FILING**  
6 **RESPONDING BRIEF**

7 to be served on the interested parties in this action as follows by placing  
8  the original  a true copy thereof enclosed in sealed envelopes addressed as stated below:

9 Kirstin M. Jahn  
10 Jahn & Associates, LLC  
11 1942 Broadway, Suite 314  
12 Boulder, Colorado 80304  
13 <kirstin@jahnlaw.com>

14  **BY MAIL:** I sealed and placed such envelope for collection and mailing to be  
15 deposited in the mail on the same day in the ordinary course of business at Los  
16 Angeles, California. The envelope was mailed with postage thereon fully prepaid. I  
17 am readily familiar with this firm's practice of collecting and processing  
18 correspondence for mailing. It is deposited with the U.S. Postal Service on that same  
19 day in the ordinary course of business.

20  **BY OVERNIGHT COURIER:** I caused such envelope to be placed for collection  
21 and delivery on this date in accordance with standard \_\_\_\_\_ delivery  
22 procedures.

23  **BY FAX:** In addition to service by mail, I transmitted a copy of the foregoing  
24 document(s) this date via telecopier to the facsimile numbers shown above.

25  **BY ELECTRONIC MAIL:** I personally delivered such envelope by electronic mail  
26 to the addressee(s) shown above.

27  **BY PERSONAL SERVICE:** I personally delivered such envelope by hand to the  
28 addressee(s) shown above.

[State] I declare under penalty of perjury under the laws of the State of California  
that the above is true and correct.

[Federal] I declare that I am employed in the office of a member of the Bar of this  
Court at whose direction the service was made. I declare under penalty of  
perjury that the foregoing is true and correct.

Executed on September 15, 2015 at Los Angeles, California.

  
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Elaine W. Yu

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UNITED STATES PATENT AND TRADEMARK OFFICE  
TRIAL AND APPEAL BOARD

JAHN & ASSOCIATES, a Limited  
Liability Corporation,

Plaintiff,

v.

Melvin N.A. Avanzado, an individual,

Defendant.

CANCELLATION NO. 92060029  
REGISTRATION NO. 4015965

[PROPOSED] ORDER GRANTING  
STIPULATED CONSENT MOTION TO  
EXTEND TIME FOR FILING  
RESPONDING BRIEF

Petition filed: September 23, 2014

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**[PROPOSED] ORDER**

The matter is before the Court on Respondent’s Stipulated Consent Motion to Extend Time for Filing Responding Brief to Plaintiff’s Motion for Summary Judgment. Having considered the matter, the Trademark Trial and Appeal Board **HEREBY ORDERS** that:

The motion for Respondent Melvin N.A. Avanzado is **GRANTED**. Respondent shall have until October 12, 2015 to file and serve his Responding Brief to Plaintiff’s Motion for Summary Judgment.

DATED: \_\_\_\_\_