

ESTTA Tracking number: **ESTTA676397**

Filing date: **06/04/2015**

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

Proceeding	92060249
Party	Defendant Dabes Ibrahim DBA Dabes Egyptian Imports
Correspondence Address	PAUL D BIANCO FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 EAST DIXIE HIGHWAY, SUITE 115 MIAMI, FL 33180-1244 UNITED STATES tmmiami@fggbb.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Paul D. Bianco
Filer's e-mail	tmmiami@fggbb.com
Signature	/Paul D. Bianco/
Date	06/04/2015
Attachments	motion-ext409Opp.pdf(13593 bytes ) exhibit a.pdf(278147 bytes )

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

In re Registration No. 4,536,391  
For the Mark: AMY DELUXE (design)  
Registration Date: May 27, 2014

Mya Saray, LLC,	)	
	)	
Petitioner,	)	Proceeding No.: 92060249
	)	
v.	)	
	)	
Dabes, Ibrahim DBA	)	
Dabes Egyptian Imports,	)	
	)	
Registrant.	)	

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**CONSENTED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PETITIONER’S FIRST MOTION TO COMPEL**

Registrant, Ibrahim Dabes (“Registrant”), by and through undersigned counsel and pursuant to TBMP Sec. 509.01(a), 37 CFR Sec. 2.116(a) and FRCP 6(b)(1), hereby moves the Board for a seven (7) day extension of time to respond to Petitioner’s First Motion to Compel (“Motion”) filed on May 28, 2015. As the Motion was served by mail, the time for filing a response is twenty (20) days from the date of mailing of the Motion, or June 17, 2015. Accordingly, Registrant, with Petitioner’s consent, hereby seeks an extension of time until June 24, 2015.

The undersigned, Registrant’s counsel of record, will be out of the country until the third week of June, 2015, that is, around the same time that the response to the Motion to Compel is due. Accordingly, it is anticipated that an additional seven (7) day extension will be necessary to respond to the Motion. Moreover, this request is being

made with the consent of Mr. Keith Blankenship, counsel for Petitioner, per his email of June 3, 2015. Please see attached Exhibit A in this regard.

WHEREFORE, Registrant respectfully requests that the Board, pursuant to TBMP Sec. 509.01(a), 37 CFR Sec. 2.116(a) and FRCP 6(b)(1), grant an extension of seven (7) days, that is, until June 24, 2015, for Registrant to file and serve a response to Petitioner's First Motion to Compel.

Date: June 4, 2015

/ Paul D. Bianco /  
Paul D. Bianco

Attorney for Registrant  
FLEIT GIBBONS GUTMAN  
BONGINI & BIANCO PL  
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Miami, Florida 33180  
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Fax: 305 830-2605  
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**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of this CONSENTED MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITIONER'S FIRST MOTION TO COMPEL was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Petitioner, on this 4th day of June 2015.

/Paul D. Bianco/  
Paul D. Bianco

FLEIT GIBBONS GUTMAN  
BONGINI & BIANCO PL

# EXHIBIT A

**Lourdes Perez**

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**From:** M. Keith Blankenship <keith@dnotebook.com>  
**Sent:** Wednesday, June 3, 2015 10:33 AM  
**To:** Lourdes Perez  
**Cc:** Paul Bianco; Dinah Fuentes  
**Subject:** Re: Discovery Responses; Our Refs.: 7400-T14-409Opp and 7400-T14-410Opp

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Lourdes,

An extension to answer by June 24th is fine by me.

Best Regards,

M. Keith Blankenship  
Da Vinci's Notebook, LLC  
10302 Bristow Center Dr.  
No. 52  
Bristow, VA 20136  
703-581-9562  
[keith@dnotebook.com](mailto:keith@dnotebook.com)

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On Jun 3, 2015, at 10:27 AM, Lourdes Perez <[lperez@fggbb.com](mailto:lperez@fggbb.com)> wrote:

Dear Keith,

Thank you for your email. You have our consent for an extension until the 12th of June for both cases.

Please note that we have received a Motion to Compel for the '249 proceeding and the '280 proceeding; however, Dr. Bianco will be out of the country until the third week of June. As a response is due that week, please let us know if we have your consent for an extension of this deadline until the fourth week in June, if possible until Wednesday June 24, 2015. Additionally, we need more time to consider our answers in light of the Board's recent decision in the '280 proceeding.

We look forward to hearing from you.

Kind regards,  
Lourdes

<image001.png>  
Lourdes Perez, Esq.  
Attorney at Law, Registered to Practice before the U.S. Patent and Trademark Office  
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**From:** M. Keith Blankenship [<mailto:keith@dnotebook.com>]  
**Sent:** Wednesday, June 3, 2015 9:51 AM  
**To:** Lourdes Perez  
**Cc:** Paul Bianco  
**Subject:** Discovery Responses

Lourdes,

I have activities on Thursday and Friday that will occupy my time and keep me from focusing on wrapping up the discovery answers, which I have marked as due on Monday the 8th. Could you please grant us an extension of time until Friday of next week (i.e., June 12)- for both cases?

Best Regards,

M. Keith Blankenship  
Da Vinci's Notebook, LLC  
10302 Bristow Center Dr.  
No. 52  
Bristow, VA 20136  
703-581-9562  
[keith@dnotebook.com](mailto:keith@dnotebook.com)

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mail to "[keith@dnotebook.com](mailto:keith@dnotebook.com)", and please delete this e-mail and any accompanying attachments from your in box, recycle bin, and any other directory, file, or electronic storage. Thank you for your cooperation.