

ESTTA Tracking number: **ESTTA702695**

Filing date: **10/16/2015**

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

Proceeding	92061916
Party	Plaintiff M/s. Emami Limited
Correspondence Address	LEO M LOUGHLIN ROTHWELL FIGG ERNST & MANBECK PC 607 14TH STREET NW 8TH FLOOR WASHINGTON, DC 20005 UNITED STATES PTO-TM-Email@rothwellfigg.com
Submission	Opposition/Response to Motion
Filer's Name	Leo M. Loughlin
Filer's e-mail	PTO-TM-Email@rothwellfigg.com
Signature	/Leo M. Loughlin/
Date	10/16/2015
Attachments	Opposition to Motion 3865-110.pdf(58687 bytes)

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

M/s. Emami Limited,	:	
	:	
Petitioner,	:	
	:	
v.	:	Opposition No. 92061916
	:	
Himani Gupta,	:	
	:	
Registrant.	:	

**PETITIONER’S OPPOSITION TO REGISTRANT’S MOTION
TO EXTEND TIME TO ANSWER**

Petitioner, M/s. Emami Limited, hereby opposes the September 30, 2015 motion of Registrant, Himani Gupta, to extend the time to answer by 30 days.

Petitioner opposes the motion to extend because “a motion to extend must set forth with particularity the facts said to constitute good cause for the extension.” See TBMP §509.01(a). Registrant’s September 30, 2015 motion to extend does not state any good cause for the requested extension. Since no good cause was shown by registrant, the motion should be denied. Moreover, registrant did not seek petitioner’s consent prior to filing the motion.

Petitioner points out that this is now the second request for an extension of time filed by Registrant without consent or good cause shown. Thus, it appears that the latest motion is done merely for the purposes of delaying this proceeding and Petitioner respectfully requests that the motion be denied.

Date: October 16, 2015

Respectfully submitted,

M/s. Emami Limited



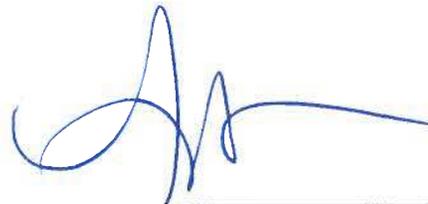
E. Anthony Figg
Leo M. Loughlin
Attorneys for Petitioner
Rothwell, Figg, Ernst & Manbeck, p.c.
607 14th Street, N.W., Suite 800
Washington, D.C. 20005
Phone: (202) 783-6040

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PETITIONER'S OPPOSITION TO REGISTRANT'S MOTION TO EXTEND TIME TO ANSWER was served by first- class mail, postage prepaid, on Registrant's address as follows:

Himani Gupta
6914 VISTA DR
SAGINAW, MI 48603
UNITED STATES

This 16th day of October, 2015.



Lisa M. Locke