

ESTTA Tracking number: **ESTTA704132**

Filing date: **10/23/2015**

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

Proceeding	92062237
Party	Defendant Yuan Jin
Correspondence Address	YUAN JIN 14418 25TH DR FLUSHING, NY 11354 UNITED STATES leon.jin@yahoo.com
Submission	Motion to Extend
Filer's Name	Matthew H. Swyers, Esq.
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	10/23/2015
Attachments	Motion for Extension of Time to File Answer.pdf(88722 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Registration No. 4,688,323
For the mark REIKO
Registered on the Principal Register on February 17, 2015

Reiko Wireless Inc.,	:	
	:	
Petitioner,	:	
	:	
vs.	:	Cancellation No. 92062237
	:	
Yuan Jin,	:	
	:	
Registrant.	:	

MOTION FOR AN EXTENSION OF TIME TO ANSWER

COME NOW Registrant, Yuan Jin (hereinafter “Registrant”), by counsel, and files the instant Motion for an Extension of Time to Answer the Petition to Cancel filed in the above-referenced matter until December 23, 2015. In support of the instant motion Registrant states as follows:

Statement of Facts

1. The instant cancellation proceeding was instituted by Petitioner, Reiko Wireless Inc., on or about September 14, 2015.
2. Registrant’s deadline to file an Answer to the Petition to Cancel is on or about October 24, 2015.
3. Registrant’s counsel requires time to consider its options, defenses, and otherwise and to continue negotiations with opposing counsel to determine if resolution may be possible.

Motion

The time for filing an answer may be extended on motion granted by the Board for good cause shown. *See* TBMP §§ 310.03(c), 509.01(a). A motion to extend must set forth with particularity the facts said to constitute good cause for the requested extension. *See* TBMP § 509.01(a).

In the instant case, Registrant seeks additional time to file its Answer to permit it to determine its possible defenses, whether they will defend the case on its merits, and to conduct factual research

concerning the Petitioner's allegations so as to provide a true and accurate Answer to the enumerated contentions contained in the Petition to Cancel filed in this matter.

This request is not being sought to delay the proceedings herein.

Conclusion

WHEREFORE for good cause shown Registrant, Yuan Jin, by counsel, prays that it be granted an extension of time to file his answer in this matter until December 23, 2015.

Respectfully submitted this 23rd day of October, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esq.

344 Maple Avenue West, PBM 151

Vienna, VA 22180

Tel. (800) 906-8626

Facsimile (270) 477-4574

mswyers@TheTrademarkCompany.com

Counsel for Registrant

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Registration No. 4,688,323
For the mark REIKO
Registered on the Principal Register on February 17, 2015

Reiko Wireless Inc.,	:	
	:	
Petitioner,	:	
	:	
vs.	:	Cancellation No. 92062237
	:	
Yuan Jin,	:	
	:	
Registrant.	:	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 23rd day of October, 2015 to be served, via first class mail, postage prepaid, upon:

BRENDAN M SHORTELL
LAMBERT & ASSOCIATES
92 STATE STREET SUITE 200
BOSTON, MA 02109

/Matthew H. Swyers/
Matthew H. Swyers