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

Applicant: **Gensys Software, Inc.**  
Application Serial Number: **78239742**  
Application Filing Date: **04/18/2003**  
Mark: **GENSYS**  
Date of Publication **07/27/2004**

### **60 Day Request for Extension of Time to Oppose for Good Cause**

Pursuant to 37 C.F.R. Section 2.102, PEI/Genesis, Inc., 2180 Hornig Road, Philadelphia, PA 19116, UNITED STATES respectfully requests that he/she/it be granted an additional 60-day extension of time to file a notice of opposition against the above-identified mark for cause shown .

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- The potential opposer needs additional time to confer with counsel
- *At this time and for several weeks heretofore, my office here in Philadelphia and the intellectual property operation in the Philadelphia office of our firm has been in a state of high activity, which at time has approached turmoil, due to several factors. First, our intellectual property paralegal, who Monday 13 September was the only intellectual property paralegal in our firm, returned to the office only yesterday after being out of the office on a ten week medical leave of absence after having undergone knee replacement surgery. Her absence severely handicapped me by effectively requiring me to perform her work and her job as well as my own. While my secretary endeavored to pick up much of the load resulting from our intellectual property paralegal's absence, both of us had been and continue to be severely stressed, in essence being unable to devote all of the time to all of the cases required, including the instant application, in the time frame available. While we have hired a second intellectual property paralegal who began work on Monday 13 September and she is experienced in the field, it is also true that this lady has been out of the field for sometime and needs to climb the learning curve before becoming a substantial contributor in the office and able to relieve some of the load from my and my secretary's shoulders.*

*Additionally, I am currently involved in representing the plaintiff in a large patent and trademark infringement action pending in the United States District Court for the Southern District of Ohio in Dayton, Ohio; the case is Maguire Products, Inc. v. Comet Automation Systems, Inc. and Ferlin Trading B.V., civil action C-3-03-198 and am also representing the plaintiff in Triple Crown America, Inc. v. Catherine Peklak and Scandinavian Formulas, Inc., civil action 04-2633, a trademark infringement action pending here in the United States District Court for the Eastern District of Pennsylvania. As a result of my involvement in these cases, particularly the Maguire Products v. Comet Automation Systems matter, and other responsibilities in my office, I need additional time in which consult with our client as to whether to file a notice of opposition and/or to take other action respecting this mark and the issued involved therewith.*

The time within which to file a notice of opposition is set to expire on 09/25/2004. PEI/Genesis, Inc. respectfully requests that the time period within which to file an opposition be extended until 11/24/2004.

Respectfully submitted,  
/Charles N. Quinn/  
09/21/2004

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