

TTAB

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

_____)
Yves Saint Laurent Fashion, B.V., Yves Saint)
Laurent Couture, and Yves Saint Laurent)
)
	Opposer,)
)
	v.)
)
Y & S Handbags, Inc.)
)
	Applicant.)
_____)

Opposition No. 119,265

Serial No. 75/646,369



01-15-2002

U.S. Patent & TMO/TM Mail Rcpt Dt. #01

BOX TTAB NO FEE
Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3513

**APPLICANT'S OPPOSITION TO
OPPOSERS' MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
APPLICANT'S SUMMARY JUDGEMENT MOTION**

Applicant, Y & S Handbags, Inc., hereby vehemently opposes Opposers' Motion for an Extension of Time to Respond to Applicant's Summary Judgment Motion dated January 10, 2002, because (1) Opposers' Motion was not consented to by Applicant, (2) because Opposers' Motion will unnecessarily prolong this Opposition, **and** (3) because Opposers were aware of Applicant's Opposition to Opposer's Motion for an Extension of Time dated January 2, 2002, wherein Applicant opposed Opposer's Motion of January 2, 2002 **and any future** motions filed without consent.

Filed by Express Mail
(Receipt No. E08941030915)
on 1-15-2002
pursuant to 37 C.F.R. 1.10.
by Thomas Doyle

Opposers are unnecessarily and blatantly delaying and prolonging matters before the Board. Irrespective of what Opposers characterize as the “significant effort” involved in responding, Opposers are **not entitled** to respond to the Motion for Summary Judgment at their convenience. The endless Motions for extensions filed by Opposers, all of which are clearly unconsented by Applicant, constitute a clear abuse of process and an unconscionable delay tactic.

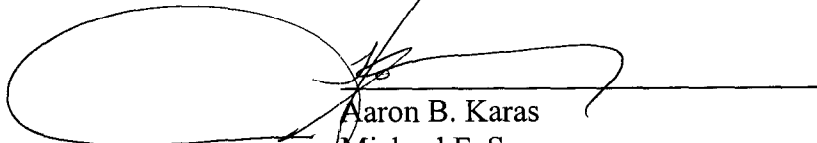
Applicant is entitled to have the Board decide its Motion for Summary Judgment in a timely manner, in accordance with time periods set originally by the Board.

Accordingly, it is respectfully requested that Opposers’ Motion dated January 10, 2002, be **DENIED**.

Dated: January 15, 2002

Respectfully submitted,

Rosenman & Colin LLP.
Attorneys for Applicant

A large, stylized handwritten signature in black ink, appearing to be 'Aaron B. Karas', is written over a horizontal line. The signature is somewhat circular and loops back to the right.

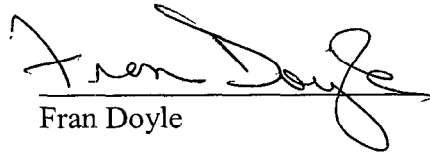
Aaron B. Karas
Michael F. Sarney
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575 Madison Avenue
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CERTIFICATE OF SERVICE

I, the undersigned, Fran Doyle, hereby certify, that on the 15th day of January, 2002, I caused to be served a true and correct copy of **APPLICANT'S OPPOSITION TO OPPOSERS' MOTION FOR AN EXTENSION OF TIME TO RESPOND TO APPLICANT'S SUMMARY JUDGEMENT MOTION** by U.S. Mail, first class, by depositing the same in a depository of the United States Postal Service on:

Jess Collen, Esq.
Collen Law Associates
80 South Highland Avenue
Ossining, New York 10562

Attorneys for Opposer


Fran Doyle