

TTAB



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By: *Linda E. Hastings*  
LINDA E. HASTINGS

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**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,	)	Opposition No. 119,265
	)	
v.	)	Serial No. 75/646,369
	)	
Y & S Handbags, Inc.	)	
	)	
Applicant.	)	

BOX TTAB NO FEE  
Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, VA 22202-3514

**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 opposes Opposers' motion filed February 13, 2002 for yet another extension of time to respond to Applicant's Motion for Summary Judgment. Applicant's Motion was filed March 15, 2001, almost one (1) year

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ago. Since then, Opposers have filed a multiplicity of motions doing nothing but prolonging the proceedings in this matter.

Applicant has repeatedly advised Opposers that it is not willing to consent to further extensions of time regardless of Opposers' reasons.

Opposers have been advised that Applicant has rejected Opposers' settlement proposal. Irrespective of what Opposers characterize as the "significant effort" involved in responding, it was Opposers, not Applicant who filed this Opposition. 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 to by Applicant and based upon specious reasons, constitute a clear abuse of process and an unconscionable delay tactic.

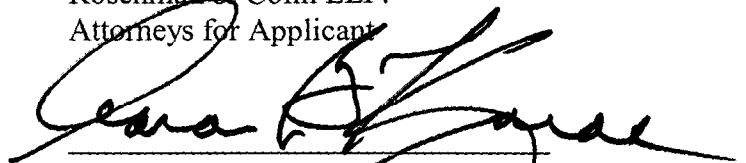
Applicant is entitled to have the Board decide its Motion for Summary Judgment in a timely manner, in accordance with time periods originally set by the Board.

Accordingly, it is respectfully requested that Opposers' Motion dated February 13, 2002, be **DENIED**.

Dated: February 22, 2002

Respectfully submitted,

Rosenman & Colin LLP.  
Attorneys for Applicant



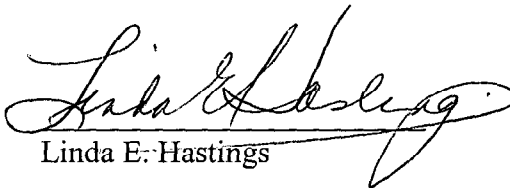
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**CERTIFICATE OF SERVICE**

I, the undersigned, Linda E. Hastings, hereby certify, that on the 22<sup>nd</sup> day of February, 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.  
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Ossining, New York 10562

Attorneys for Opposer

  
Linda E. Hastings