

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

TTAB

----- X

ING USA HOLDING CORPORATION, :

Opposer, :

v. :

ORANGE PERSONAL COMMUNICATIONS : Opposition No. 91161183

SERVICES LIMITED, :

Applicant. :

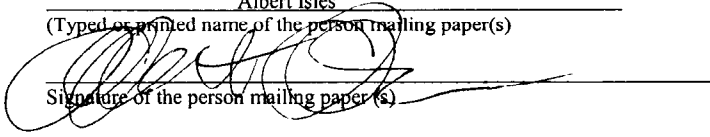
----- X

Commissioner for Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3513

Express Mail Label No.: EV 498830399 US
Date of Deposit September 22, 2004

I hereby certify correspondence is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10 on the date indicated above and is addressed to the Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3513.

Albert Isles
(Typed or printed name of the person mailing paper(s))



APPLICANT'S REQUEST FOR EXTENSION OF TIME TO ANSWER THE NOTICE OF OPPOSITION WITH CONSENT OF OPPOSER

Applicant, Orange Personal Communications Services Ltd. ("Orange PCSL") hereby requests a thirty day extension of time in which to answer the Notice of Opposition from October 15, 2004 until November 14, 2004 and that all other dates be reset accordingly. Mark B. Harrison, the attorney for Opposer, ING USA Holding Corporation consented to this request in a telephone conference with the undersigned on September 21, 2004. If granted, this request would extend the dates to the following:

	<u>Current</u>	<u>Proposed</u>
Discovery date to close	March 24, 2005	April 23, 2005



30-day Testimony period for party in position of plaintiff to close

June 22, 2005

July 22, 2005

30-day Testimony period for party in position of defendant to close

August 21, 2005

September 20, 2005

15-day rebuttal testimony period for plaintiff to close

October 5, 2005


November 4, 2005

Respectfully submitted,

MORGAN & FINNEGAN, LLP

Dated: September 22, 2004

By:



Dickerson M. Downing


Attorneys for Opposer
345 Park Avenue
New York, NY 10154
(212) 415-8752

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served, by first-class mail, postage prepaid, a copy of the foregoing document upon the attorney of record for Applicant as listed below on the 22nd of September 2004:

Mark B. Harrison, Esq.
VENABLE, BAETJER, HOWARD
& CIVILETTI, LLP
1201 New York Avenue, N.W., Suite 1000
Washington, D.C. 20005-3917

Dated: New York, New York
September 22, 2004


Dickerson M. Downing