

ESTTA Tracking number: **ESTTA231665**

Filing date: **08/20/2008**

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

Proceeding	91181262
Party	Plaintiff UPCOMING TM S.A.
Correspondence Address	Daniel T. Earle Shlesinger, Arkwright & Garvey, LLP 1420 King Street, Suite 600 Alexandria, VA 22314 UNITED STATES jim@sagllp.com, danearle@sagllp.com, nitasantiago@sagllp.com
Submission	Motion to Extend
Filer's Name	Daniel T. Earle
Filer's e-mail	danearle@sagllp.com
Signature	/dte/
Date	08/20/2008
Attachments	R-5805.PDF (3 pages)(65442 bytes)

Opposition No. 91/181,262

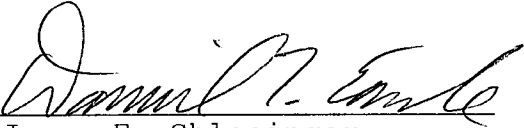
information is not yet complete, and Opposer's counsel has not had the opportunity to discuss the additional information required to respond to Applicant's Discovery Requests with Opposer, due to the press of other litigation matters. Opposer is preparing for an oral hearing in another matter, as well as dealing with testimony and discovery issues in two other Board proceedings.

Accordingly, Opposer submits that there is good cause for this extension. On August 20, 2008, Opposer e-mailed counsel for Applicant to request consent to this extension. Opposer has not yet received a response.

Respectfully submitted,

UPCOMING TM S.A.

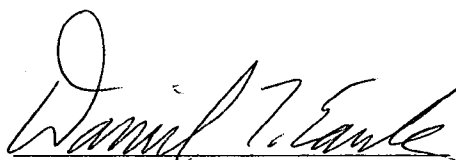
Date: Aug. 20, 2008

By: 
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CERTIFICATE OF SERVICE

I, Daniel T. Earle, Attorney for Opposer, do hereby certify that this MOTION FOR AN EXTENSION OF TIME TO RESPOND TO APPLICANT'S DISCOVERY REQUESTS has been served upon Applicant by mailing a copy thereof by prepaid first class mail to William C. Wright, Epstein Drangel Bazerman & James, LLP, 60 E. 42nd Street, Room 820, New York, New York 10165-0820, this 20th day of August, 2008.

A handwritten signature in cursive script that reads "Daniel T. Earle". The signature is written in black ink and is positioned above a horizontal line.

Daniel T. Earle