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

Proceeding	91187424
Party	Defendant Cafetalera Castellon, S.A.
Correspondence Address	OSCAR L. ALCANTARA GOLDBERG KOHN 55 E MONROE ST STE 3300 CHICAGO, IL 60603-5792 tmapps@goldbergkohn.com
Submission	Motion to Extend
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Date	12/22/2008
Attachments	Motion for Extension .pdf (2 pages)(25731688 bytes)

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

CACIQUE, INC.)
)
)
v.) No. 91187424
)
CAFETALERA CASTELLON, S.A.)

MOTION FOR EXTENSION OF TIME

Applicant Cafetalera Castellon, S.A., through its undersigned counsel hereby moves the Board for an extension of time in which to Answer or otherwise respond to the Notice of Opposition in the above-captioned proceedings. In support of its Motion, Applicant states as follows:

1. Applicant is a Sociedad Anonima headquartered in Matagalpa, Nicaragua. Applicant is represented by lead counsel in Nicaragua and by the undersigned with respect to matters before the United States Patent and Trademark Office.

2. Working through lead counsel in Nicaragua and various representatives of Applicant, the undersigned was only able to obtain final instructions and authorizations to represent the Applicant on December 19, 2008. Specifically, Applicant instructed the undersigned on December 19, 2008 to seek an extension of the time in which to Answer or otherwise respond to the Notice of Opposition, and to communicate with Opposer's counsel in order to determine whether a settlement of the Opposition can be reached prior to expenditure of significant litigation resources. Applicant's deadline for filing an Answer or other response to the Notice of Opposition in this case is December 22, 2008.

3. The undersigned has attempted to reach Opposer's counsel in order to initiate the good faith negotiation of a potential settlement in this case. The undersigned has also communicated a written request to Opposer's counsel seeking Opposer's consent to the present Motion to Extend. The undersigned has, however, not yet been able to communicate directly with Opposer's counsel in order to obtain such consent.

4. Applicant seeks an order from the Board granting a short, thirty-day extension of time in which to answer or otherwise respond to the Notice of Opposition in order to determine whether good faith negotiations may lead to the amicable resolution of these proceedings. Applicant submits that Opposer will not be prejudiced by the granting of such a Motion; that this Motion is not being filed

for the purposes of delay; and that the present Motion is the first such motion Applicant has filed in these proceedings.

WHEREFORE, Applicant Cafetalera Castellon, S.A. prays for a 30-day extension of its deadline for filing an answer or other response to the Notice of Opposition.

CAFETALERA CASTELLON, S.A

BY //s// Oscar L. Alcantara//
Its Counsel of Record

Oscar L. Alcantara, Esq.
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CERTIFICATE OF TRANSMITTAL

I hereby certify that this Motion for Extension of Time is being electronically transmitted in pdf format to the Trademark Trial & Appeal Board through ESSTA on the following date: December 22, 2008.

//s// Oscar L. Alcantara//

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time was served upon Opposer's counsel on December 22, 2008 via first class U.S. Mail at the following address:

Ju Chang
1880 Century Park East
Suite 420
Los Angeles, California 90067

//s// Oscar L. Alcantara//
