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

Proceeding	91200650
Party	Defendant Vantage Hospitality Group, Inc.
Correspondence Address	KEVIN P. CROSBY GRAYROBINSON, P.A. 401 E LAS OLAS BLVD STE 1850 FORT LAUDERDALE, FL 33301-4236  kevin.crosby@gray-robinson.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kevin P. Crosby
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Signature	/Kevin P. Crosby/
Date	08/25/2011
Attachments	Unopposed Motion.pdf ( 3 pages )(87713 bytes )

**UNITED STATES PATENT AND TRADEMARK OFFICE**  
**TRADEMARK TRIAL AND APPEAL BOARD**

MARKET AMERICA, INC.

Opposer

Opposition No. 91200650  
Serial No. 85145907

VANTAGE HOSPITALITY GROUP, INC.

Applicant

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**APPLICANT'S UNOPPOSED MOTION REQUESTING ACCEPTANCE OF**  
**LATE-FILED ANSWER TO NOTICE OF OPPOSITION**

Comes now the Applicant, VANTAGE HOSPITALITY GROUP, INC., through undersigned counsel, and respectfully requests that the Board accept Applicant's Answer to the Notice of Opposition filed contemporaneously herewith outside of the time originally set by the Board for response, and as grounds therefore states as follows:

- 1) This Opposition proceeding was commenced on July 13, 2011 by the filing of a Notice of Opposition ("Notice") by Market America, Inc., Opposer.
- 2) By order dated July 13, 2011, Applicant was given until Monday August 22, 2011 within which to respond to the Notice. Through a mistake on the part of undersigned counsel and his docket clerk, no response to the Notice was filed by the deadline.
- 3) Undersigned counsel has been informed by counsel for Opposer, Ryan Luft, Esq., that Opposer does not object to the requested relief. It is believed that no change to the existing schedule of dates will be necessary.
- 4) Undersigned and counsel for Opposer have scheduled a telephonic settlement conference for Wednesday August 31, 2011.

5) No prejudice will result to Opposer by the requested brief (four day) enlargement of time, and the length of the delay will not have any material impact on this proceeding. Moreover, undersigned counsel has acted, and is presently acting, in good faith. A failure by undersigned counsel's docketing clerk to remind counsel of the August 22, 2011 response deadline resulted in that deadline being missed. A routine check on August 26, 2011 of undersigned counsel's email activity alerted undersigned counsel to the fact that no response had been filed by the deadline. Undersigned counsel apologizes for his inadvertence. However, it is believed that good cause for the requested relief has been shown.

Under penalty of perjury, I declare that the foregoing is true and correct this 26<sup>th</sup> day of August, 2011.

GRAY ROBINSON  
Attorneys for Plaintiff  
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Facsimile: 954-761-8112

/Kevin P. Crosby  
Kevin P. Crosby  
GrayRobinson, P.A.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via facsimile and U.S. Mail on this 26th day of August, 2011 to Ryan S. Luft, Esq., Market America, Inc., 1302 Pleasant Ridge Road, Greensboro, NC 27409.

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By: /Kevin P. Crosby  
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