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

Proceeding	91220096
Party	Defendant Morales Caro, Luis R.
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Date	10/19/2015
Attachments	MOTION ON CONSENT REQUESTING EXTENSION OF TIME TO RESPOND TO MOTION TO COMPEL.pdf(237724 bytes )

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

GlaxoSmithKline Consumer Healthcare  
(UK) IP Limited

Opposer

v.

Morales Caro, Luis R.

Applicant

Opposition No. 91220096

Mark: **SANADOL**

Serial No. 86/244,742

**UNITED STATES PATENT AND TRADEMARK OFFICE**

Trademark Trial and Appeal Board

P.O. Box 1451

Alexandria, VA 223 13-1451

**MOTION ON CONSENT REQUESTING AN EXTENSION OF TIME TO RESPOND TO  
OPPOSER’S MOTION TO COMPEL DISCOVERY**

COMES NOW Applicant, Luis R. Morales Caro (“Applicant”), by and through their undersigned attorneys and respectfully set forth and pray as follows:

1. On September 30, 2015, GlaxoSmithKline Consumer Healthcare (UK) IP Limited (“Opposer”) filed with the Trademark Trial and Appeal Board (“TTAB”) a Motion to Compel Discovery (“Motion to Compel”), requesting that the TTAB issue an order compelling Applicant to respond to Opposer’s Interrogatory No. 4 and to produce all documents responsive to Opposer’s Request for Production of Documents 10 and 14.

2. Pursuant to 37 CFR §2.127(a) and Rule 113.05 of the TTAB Manual of Procedure (“TBMP”), Applicant had fifteen (15) days, plus five (5) additional days, that is until October 20, 2015, to respond to Opposer’s Motion to Compel.

3. However, Applicant respectfully submits that Applicant's counsel was out of the jurisdiction for the last week and a half and will be travelling out of the country again this week, and will not return to the office until Monday, October 26, 2015. Therefore, Applicant's counsel has not and will not be able to duly respond to Opposer's Motion to Compel and thus, most respectfully submits it needs an additional time to review Opposer's Motion to Compel and prepare its response to such Motion.

4. Moreover, Applicant informed of the foregoing to Opposer's counsel and requested a 21-day extension of time to respond to Opposer's Motion to Compel Discovery, which Opposer consented to.

5. Therefore, pursuant to Rule 509 of the TBMP, Applicant respectfully requests the Board a 21-day extension of time to respond to Opposer's Motion to Compel.

**WHEREFORE**, Applicant hereby respectfully requests the Board to take notice of the foregoing circumstances and grant Applicant a 21-day extension of time to respond to Opposer's Motion to Compel.

**RESPECTFULLY SUBMITTED.**

This 19<sup>th</sup> day of October, 2015

**IT IS HEREBY CERTIFIED** that on this date, a true and correct copy of the foregoing "MOTION ON CONSENT REQUESTING AN EXTENSION OF TIME TO RESPOND TO OPPOSER'S MOTION TO COMPEL DISCOVERY" was served upon the Opposer via electronic mail to these emails: [paul.llewellyn@kayescholer.com](mailto:paul.llewellyn@kayescholer.com), [tmddocketing@kayescholer.com](mailto:tmddocketing@kayescholer.com), [john.rynkiewicz@kayescholer.com](mailto:john.rynkiewicz@kayescholer.com).

On this 19<sup>th</sup> day of October, 2015.

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