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Filing date: **02/12/2015**

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

Proceeding	91220096
Party	Defendant Morales Caro, Luis R.
Correspondence Address	SAMUEL F. PAMIAS HOGLUND & PAMIAS, P.S.C. 256 ELEANOR ROOSEVELT ST. SAN JUAN, PR 00918  samuel@hhoglund.com;aileen@hhoglund.com
Submission	Motion to Extend
Filer's Name	Samuel F. Pamias
Filer's e-mail	samuel@hhoglund.com, aileen@hhoglund.com, jaime@hhoglund.com, nahomy@hhoglund.com, eida@hhoglund.com, adriana@hhoglund.com, veronica@hhoglund.com
Signature	/Samuel F. Pamias/
Date	02/12/2015
Attachments	SANADOL Notice of Appearance and Extension of time.pdf(73260 bytes )

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

SmithKline Beecham 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

**NOTICE OF APPEARANCE AND MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO OPPOSER'S "NOTICE OF OPPOSITION"**

COMES NOW Applicant, Luis R. Morales Caro (hereinafter "Applicant"), by and through its undersigned attorney who respectfully states and prays as follows:

1. The undersigned counsel, Samuel F. Pamias, enters his appearance in this case on behalf of above mentioned party and respectfully requests the Trademark Trial and Appeal Board (hereinafter "TTAB" or "Board") to be electronically served of all future pleadings, orders, notices and other documents filed in the proceeding.

2. On **January 9, 2015**, Opposer filed with the Board a "Notice of Opposition" (hereinafter "Opposition"). According to the proceeding schedule set by the TTAB, an answer from the appearing Applicant is due on **February 18, 2015**.

3. In its "Notice of Opposition", Opposer made several factual and legal allegations and arguments that require further study and analysis by Applicant in order

to properly respond to Opposer's Opposition. Moreover, it must be brought to this Honorable Board's attention that the parties have engaged in settlement conversations that have not concluded and which may render the captioned case moot.

4. In light of the foregoing circumstances, Applicant very respectfully submits that just cause exists for the Board to grant it a 30-day extension of time to file its response to Opposer's Opposition and that such extension would cause no undue prejudice to Opposer.

**WHEREFORE**, Applicant hereby respectfully requests a 30-day extension of time to submit a response to Opposer's "Notice of Opposition" or otherwise plead.

**RESPECTFULLY SUBMITTED**

This 12<sup>th</sup> day of February 2015.

**IT IS HEREBY CERTIFIED** that on this date, a true and correct copy of the foregoing "NOTICE OF APPEARANCE AND MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO OPPOSER'S NOTICE OF OPPOSITION" was served by e-mail to paul.llewellyn@kayescholer.com, tmdocketing@kayescholer.com, john.rynkiewicz@kayescholer.com and by first class mail upon Opposer's representative: Paul Llewellyn Kaye Scholer LLP 250 West 55<sup>th</sup> Street New York NY 10019-9710.

On this 12th day of February 2015.

**HOGLUND & PAMIAS, P.S.C.**  
256 Eleanor Roosevelt  
San Juan, PR 00918  
Telephone: (787)772-9200/9834  
Facsimile: (787)772-9533

*s/ Samuel F. Pamias Portalatín, Esq.*  
Samuel F. Pamias Portalatín, Esq.  
E-mail: [samuel@hhoglund.com](mailto:samuel@hhoglund.com)

Attorney for Applicant