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

Proceeding	91251473
Party	Defendant Cumhuriyet Meats
Correspondence Address	BRADLEY S. ROTHSCHILD ROTHSCHILD & ASSOCIATES LLC 38 HIGH AVENUE 4TH FLOOR NYACK, NY 10960 UNITED STATES Primary Email: brad@rothschildesq.com 845.287.0011
Submission	Opposition/Response to Motion
Filer's Name	Bradley S. Rothschild
Filer's email	brad@rothschildesq.com
Signature	/Bradley S. Rothschild/
Date	08/03/2020
Attachments	Declaration in Opposition to Discovery Motion.pdf(180452 bytes)

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

In the Matter of Application Serial No. 88/284,023

For the mark: CUMHURIYET

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AFYON ET VE ET MAMULLERI SANAYI VE TICARET LIMITED SIRKETI,	:	Opposition No. 91/251,473
Opposer,	:	
v.	:	
CUMHURIYET MEATS,	:	
Applicant.	:	

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**DECLARATION OF BRADLEY S. ROTHSCHILD, ESQ. IN SUPPORT OF APPLICANT’S
OPPOSITION TO MOTION TO COMPEL DISCOVERY AND APPLICANT’S CROSS
MOTION TO EXTEND THE DISCOVERY PERIOD**

I, Bradley S. Rothschild, declare that the following is true and correct pursuant to 28 U.S.C. §1746:

1. I am the principal of the law firm Rothschild & Associates LLC, attorneys for Applicant CUMHURIYET MEATS (“Applicant”). I am familiar with the subject matter of this declaration based upon my own personal knowledge or familiarity with the case files and documents.
2. I was retained to represent Applicant in the instant opposition proceeding on July 23, 2020, and

immediately entered my appearance.

3. On July 23, 2020 I also contacted Opposer's counsel to discuss an extended discovery schedule.
4. Prior to my appearance Applicant appeared on a *pro se* basis, and made efforts to respond to discovery demands, which Opposer purportedly finds deficient.
5. Applicant proposed an extended discovery schedule that would allow for both Opposer and Applicant to exchange and respond to discovery demands.
6. Opposer would only agree to an arrangement where Opposer had to accept Applicant's discovery responses as sufficient, and within a week, before Applicant first would be allowed to serve Applicant's own discovery demands.
7. When I did not agree to this proposal, Opposer filed the instant motion.
8. Even a quick review of Opposer's First and Second Sets of Interrogatories reveals that Opposer has exceeded the number of interrogatories permitted under 37 C.F.R. §2.120(d), when each subpart is counted in accordance with the Rule. See Opposer's Exhibits A and E.
9. Applicant objects to Opposer's Interrogatories on this basis, and Opposer should be required re-serve revised interrogatories in accordance with 37 C.F.R. §2.120(d).
10. Based on the above, Applicant opposes Opposer's instant motion, and cross-moves for a 180 day extension of the discovery period, allowing both Applicant and Opposer a fair opportunity to participate in discovery so that this matter may be decided on the merits, and not simply procedure.

I declare that the foregoing is true and correct under penalties of perjury.

Executed on August 3, 2020 in Nyack, New York.

Respectfully submitted,

ROTHSCHILD & ASSOCIATES LLC

s/Bradley S. Rothschild/

Bradley S. Rothschild, Esq.

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Attorneys for Applicant

CUMHURIYET MEATS

CERTIFICATE OF SERVICE

Pursuant to Trademark Rule 2.119, I hereby certify that on August 3, 2020 a true and complete copy of the foregoing DECLARATION OF BRADLEY S. ROTHSCHILD, ESQ. IN SUPPORT OF APPLICANT'S OPPOSITION TO MOTION TO COMPEL DISCOVERY AND APPLICANT'S CROSS MOTION TO EXTEND THE DISCOVERY PERIOD has been served on Opposer by delivering a true and correct copy thereof to Petitioner by electronic mail on attorneys for Opposer at:

Matthew D. Asbell
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Dated: August 3, 2020

By: /s /Bradley S. Rothschild/

Bradley S. Rothschild, Esq.