

ESTTA Tracking number: **ESTTA1082024**

Filing date: **09/15/2020**

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

Proceeding	91252171
Party	Defendant American Construction Source LLC
Correspondence Address	CHARLES P BACALL VERRILL DANA LLP ONE PORTLAND SQUARE PORTLAND, ME 04101-4054 UNITED STATES Primary Email: trademarks@verrilldana.com Secondary Email(s): cbacall@verrilldana.com, mfuller@verrilldana.com, shirshon@verrill-law.com 207-774-4000
Submission	Motion to Extend
Filer's Name	Sara E. Hirshon
Filer's email	shirshon@verrill-law.com
Signature	/s/ Sara E. Hirshon
Date	09/15/2020
Attachments	Fourth Motion to Extend Answer Deadline.pdf(5926 bytes )

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

ACS Actividades de Construccion y Servicios, S.A. )	)	
Opposer, )	)	
v. )	)	
American Construction Source LLC, )	)	Opposition No. 91252171
Applicant. )	)	

**APPLICANT’S FOURTH CONSENTED-TO MOTION TO  
EXTEND ANSWER DEADLINE**

Applicant, American Construction Source LLC (“Applicant”), by and through counsel, hereby files this Consented-to Motion requesting an extension of time to file its response from September 16, 2020 to October 16, 2020. The grounds in support of its Motion are below:

1. Applicant requests an additional 30-day extension to file its response until October 16, 2020, because the parties have reached a settlement in principle and need additional time to prepare and finalize settlement papers.

2. The parties believes that they can resolve this dispute without further litigation. The Opposer is affiliated with a large international conglomerate headquartered in Spain. Since the beginning of the COVID-19 pandemic, it has been difficult to obtain information and located in Spain and obtain the necessary approvals for resolution.

3. The parties believe that additional time is necessary to resolve this dispute.

WHEREFORE, Applicant, American Construction Source LLC requests until October 16, 2020 to respond to Opposer’s Notice of Opposition.

Dated: September 15, 2020

/s/ Sara E. Hirshon  
Charles P. Bacall  
Sara E. Hirshon

Counsel for Applicant

Verrill Dana, LLP  
One Portland Square  
Portland, ME 04101-4054  
(207) 774-4000  
[cbacall@verrill-law.com](mailto:cbacall@verrill-law.com)  
[shirshon@verrill-law.com](mailto:shirshon@verrill-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Consented-to Motion to Extend Answer Deadline was served upon Opposer, by forwarding the same via electronic mail to [jesus@sachelima.com](mailto:jesus@sachelima.com) and via first class mail, postage prepaid to Opposer's Attorney, Jesus Sachelima, Esq., Sachelima & Associates, P.A., 235 S.W. Le Jeune Road, Miami, Florida 33134.

Dated: September 15, 2020

/s/ Sara E. Hirshon  
Charles P. Bacall  
Sara E. Hirshon  
Counsel for Applicant

Verrill Dana, LLP  
One Portland Square  
Portland, ME 04101-4054  
(207) 774-4000  
[cbacall@verrill-law.com](mailto:cbacall@verrill-law.com)  
[shirshon@verrill-law.com](mailto:shirshon@verrill-law.com)