

ESTTA Tracking number: **ESTTA1199337**

Filing date: **03/28/2022**

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

Proceeding no.	91254894
Party	Defendant Ramenhood LLC
Correspondence address	R. LEE FRALEY SNELL & WILMER L.L.P. 400 E. VAN BUREN ST. PHOENIX, AZ 85004-2202 UNITED STATES Primary email: ipdocket@swlaw.com Secondary email(s): lfrale@swlaw.com, sschahn@swlaw.com, mhallerman@swlaw.com, tmdocket@swlaw.com 602-382-6000
Submission	Motion to Extend
Filer's name	Mary D. Hallerman
Filer's email	mhallerman@swlaw.com, tmdocket@swlaw.com, lfrale@swlaw.com, sschahn@swlaw.com
Signature	/Mary D. Hallerman/
Date	03/28/2022
Attachments	RHAZ Motion to Extend 3-28-22 as filed.pdf(280259 bytes)

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

RAMEN HOOD, LLC,)	
)	
Opposer,)	
)	Consolidated Opposition No.
v.)	91254894
)	
RAMENHOOD, LLC,)	Serial Nos. 87/870,059;
)	87/717,912
Applicant)	

**APPLICANT RAMENHOOD LLC’S MOTION TO EXTEND DEADLINES BY
THIRTY DAYS**

Applicant Ramenhood, LLC (“Applicant”) requests a further extension of all pending deadlines for an additional thirty days, including the March 28, 2022 closure of Applicant’s trial period, to allow Applicant to focus its limited money, time, and resources on attempting to reach a settlement in this matter. While settlement discussions have steadily progressed closer to a final resolution between the parties in recent months, Opposer does not consent to this motion.

Good cause exists for granting this requested extension. Applicant is a small business solely owned by Mr. James Xie. Since the parties’ last requested extension, Mr. Xie has diligently been working to prepare a counteroffer. This includes working out financing and speaking with venture capital and other investment professionals with restaurant industry experience in consideration of his business needs and objectives. Over the last two weeks, Mr. Xie has had multiple communications with his attorneys over email and by telephone concerning this proceeding and structuring a response to Opposer’s latest counteroffer. On top of all of this, Mr. Xie has been managing and operating his two restaurants, working seven days a week, and attending to the affairs of a recently deceased parent. Mr. Xie asks for additional time so that he

can use his time, money, and resources on settling this longstanding dispute, rather than expend that same limited time, money, and resources on trial during the next thirty days.

Given Applicant's professional and personal obligations, Applicant's request is reasonable. Applicant is committed to attempting to find a potential resolution to this proceeding, but needs additional time to ensure that he has the means to do so.

Applicant respectfully requests that its Motion be granted and that the deadlines in the schedule be reset as follows:

Event	Current Deadline	Proposed Deadline
Defendant's 30-Day Trial Period Ends	03/28/2022	04/27/2022
Plaintiff's Rebuttal Disclosures Due	04/12/2022	04/27/2022
Plaintiff's 15-Day Rebuttal Period Ends	05/12/2022	06/11/2022
Plaintiff's Opening Brief Due	07/11/2022	08/10/2022
Defendant's Brief Due	08/10/2022	09/09/2022
Plaintiff's Reply Brief Due	08/25/2022	09/24/2022
Request for Oral Hearing (optional) Due	09/04/2022	10/04/2022

Respectfully submitted,

Dated: March 28, 2022

By: /Mary D. Hallerman/
Mary D. Hallerman
Snell & Wilmer L.L.P.
2001 K Street, N.W., Suite 425 North
Washington, D.C. 20006
202-908-4262
tmdocket@swlaw.com,
mhallerman@swlaw.com
Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on Opposer by emailing a copy to Opposer's counsel's e-mail addresses of record this 28th of March 2022.

/Mary D. Hallerman/
Mary D. Hallerman