

ESTTA Tracking number: **ESTTA1171036**

Filing date: **11/08/2021**

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

Proceeding	91266044
Party	Plaintiff Joma Sport, S.A.
Correspondence Address	RICHARD LEHV FROSS ZELNICK LEHRMAN & ZISSU PC 151 WEST 42ND STREET 17TH FLOOR NEW YORK, NY 10036 UNITED STATES Primary Email: rlehv@fzlz.com Secondary Email(s): Bessinger-docket@fzlz.com, ttabfiling@fzlz.com 212-813-5900
Submission	Motion to Extend
Filer's Name	Richard Lehv
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Signature	/Richard Lehv/
Date	11/08/2021
Attachments	F4341743.PDF(200236 bytes)

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

JOMA SPORT, S.A.,

Opposer,

-against-

MAXBIKE, INC.,

Applicant.

Opposition No. 91266044

OPPOSER’S MOTION FOR EXTENSION OF TIME

Opposer, Joma Sport, S.A., moves for a sixty-day extension of time to submit its pretrial disclosures and for a sixty-day extension of all other dates in this proceeding.

The additional time is needed for Opposer to prepare and submit its pretrial disclosures because Opposer’s counsel does not communicate directly with Opposer. Instead, Opposer’s counsel communicates with a law firm located in Spain, which in turn communicates with Opposer, also located in Spain. Further, the necessary instructions and requests from counsel must be translated into Spanish, and the resulting information must be translated into English. Finally, neither Spanish counsel nor Opposer are familiar with U.S. litigation procedures, which must be explained, and any questions they have must be answered. As a result of all these factors, additional time is needed.

In an email dated November 8, 2021, Applicant’s counsel declined to consent to this extension, necessitating this motion.

Dated: New York, New York
November 8, 2021

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: /Richard Lehv/
Richard Lehv
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Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of November 2021, I caused a true and correct copy of the foregoing to be sent by email to Applicant's attorney of record at verano.place@yahoo.com and michael@sobowo.com.

/Richard Lehv/
Richard Lehv