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

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|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proceeding no. | 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 |
| Filer's email | rlehv@fzlz.com, bessinger-docket@fzlz.com, ttabfiling@fzlz.com |
| Signature | /Richard Lehv/ |
| Date | 01/06/2022 |
| Attachments | F4424461.PDF(200791 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 because the undersigned counsel had unexpected commitments in another matter, a civil action in the United States District Court in the Eastern District of Virginia, and because of the year-end holidays. Moreover, as previously explained, 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.

We have asked Applicant’s counsel whether they will consent, but have not heard back.

Dated: New York, New York
January 6, 2022

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: /Richard Lehv/

Richard Lehv

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New York, New York 10036

Phone: (212) 813-5900

Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2022, 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