

ESTTA Tracking number: **ESTTA1123597**

Filing date: **03/29/2021**

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

Proceeding	91266044
Party	Plaintiff Joma Sport, S.A.
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Submission	Motion to Extend
Filer's Name	Richard Lehv
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Signature	/Richard Lehv/
Date	03/29/2021
Attachments	JOMA Maxbike Motion to extend.pdf(94553 bytes )

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

In the Matter of Application Serial No. 88842657  
Mark: JOMA  
Filed: March 20, 2020  
Published in the *Official Gazette*: July 21, 2020

JOMA SPORT, S.A.,

Opposer,

-against-

MAXBIKE, INC.,

Applicant.

Opposition No. 91266044

**MOTION TO EXTEND DEADLINES**

Opposer moves to extend the deadline for serving Initial Disclosures, which expires today, and all other deadlines, by thirty days. The reason for the motion is that Opposer's counsel communicates with a law firm in Spain, which in turn communicates with the client in Spain. Further, both Spanish counsel and the client are not familiar with U.S. TTAB procedures, which we must explain to them. All this results in delays. In an email send to Applicant's counsel today, Opposer's counsel sought consent from Applicant, but has not received a response.

Dated: New York, New York  
March 29, 2021

Respectfully submitted,

FROSS ZELNICK LEHRMAN  
& ZISSU, P.C.

By: /Richard Lehv/  
Richard Lehv  
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New York, New York 10036  
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*Attorneys for Opposer*

## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing is being served by email on Applicant's counsel this 29<sup>th</sup> day of March, 2021 at

[verano.place@yahoo.com](mailto:verano.place@yahoo.com); [michael@sobowo.com](mailto:michael@sobowo.com).

/Richard Lehv/  
Richard Lehv