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Filing date: **12/06/2021**

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

Proceeding	91268468
Party	Plaintiff Mercado Eletr�nico, S.A.
Correspondence Address	ROY D. GROSS THE ROY GROSS LAW FIRM, LLC 50 WASHINGTON STREET, SUITE 737/745 NORWALK, CT 06854 UNITED STATES Primary Email: roy@rgrosslaw.com Secondary Email(s): paralegal@rgrosslaw.com 2034230235
Submission	Motion to Extend
Filer's Name	Roy D. Gross
Filer's email	roy@rgrosslaw.com
Signature	/Roy D. Gross/
Date	12/06/2021
Attachments	07215-N0001A-Motion-Extension.pdf(122348 bytes)

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

Mercado Eletrônico, S.A.,)	
)	
Plaintiff, Opposer,)	Opposition No.
)	US Trademark No. 88/780,729
v.)	
)	
Global Trade Specialists, Inc.,)	
Defendant, Applicant.))	

STIPULATED JOINT MOTION TO EXTEND CLOSE OF DISCOVERY

Plaintiff, Mercado Eletrônico, S.A. (hereinafter “Mercado Eletrônico” or “Opposer”) and Defendant, Global Trade Specialists, Inc. (hereinafter “Global Trade” or “Applicant”) (collectively, “the Parties”), through their undersigned counsel, file this stipulated joint motion for a 60-day Extension of Time to extend the close of discovery and for good cause states as follows:

1. The current deadline for the close of discovery is December 6, 2021.
2. This is the first request for an extension of time to extend discovery. The Parties are requesting a 60-day extension of time, extending the deadline for the close of discovery to February 6, 2022.
3. The Parties are requesting an extension of time to allow for sufficient time for the Parties to fulfill their discovery obligations.

4. This request is made in good faith and not for purposes of undue delay and will not unduly prejudice any of the parties involved in this action.

5. A proposed order granting the requested relief is submitted herewith.

WHEREFORE, the Parties respectfully requests that the TTAB grant this motion to extend the deadline for close of Discovery to February 6, 2022.

Respectfully Submitted,

/Roy D. Gross/

Date: December 6, 2021

Roy D. Gross
THE ROY GROSS LAW, FIRM, LLC
50 Washington Street, Suite 737/745
Norwalk, Connecticut 06854
Telephone: 203-423-0235
roy@rgrosslaw.com

Attorney for Opposer Mercado Eletrônico, S.A.

Respectfully Submitted,

/Arnold S. Weintraub/

Date: December 6, 2021

Roy D. Gross
THE WEINTRAUB GROUP, P.L.C.
24901 Northwestern Highway, Suite 311
Southfield, Michigan 48075
Telephone: 248-809-2005
aweintraub@weintraubgroup.com

Attorney for Applicant Global Trade Specialists, Inc.

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Mercado Eletrônico, S.A.,)	
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Plaintiff, Opposer,)	US Trademark No. 88/780,729
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Global Trade Specialists, Inc.,)	
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Defendant, Applicant.))	

**ORDER GRANTING MOTION FOR EXTENSION OF TIME TO RESPOND TO
COUNTERCLAIM**

This matter having come before the TTAB on the Scheduling Order [Dkt. No. 2], and the TTAB being otherwise duly advised in the premises, it is hereby ORDERED and ADJUDGED that the Close of Discovery be extended to **February 6, 2022**.

DONE and ORDERED this ____ day of _____, 2021.

JILL M MCCORMACK
Interlocutory Attorney