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

Proceeding	91272143
Party	Defendant Shanghai Zhenglang Technology Co., Ltd.
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Submission	Motion to Extend
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Date	11/15/2021
Attachments	motion extension of time.pdf(90128 bytes)

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

Hangzhou Mengku Technology Co., Ltd.,
Fuzhou Mengku Technology Co., Ltd.,

Petitioner

vs.

Shanghai Zhenglang Technology Co., Ltd..
Applicant

OPPOSITION No: 91272143

**Applicant Shanghai Zhenglang Technology Co., Ltd's Motion for Extension of time to
Answer or Otherwise Response to the Notice of Opposition Under Fed R. Civ. P. 6(b)**

Applicant, Shanghai Zhenglang Technology Co., Ltd., through counsel, Shan Zhu Esq., moves the Board for an extension of time for Applicant to Answer or otherwise response to the Notice of Opposition for 30 days.

Argument

On October 6, 2021, the Opposer Hangzhou Mengku Technology Co., Ltd and Fuzhou Mengku Technology Co., Ltd. Filed an opposition against Applicant Shanghai Zhenglang Technology Co., Ltd. The Applicant's answer is due on today, November 15, 2021.

The Applicant was initially represented by Johnathan G. Morton. On or about November 13, the Applicant retained the undersigned and substituted Mr. Morton, who will not represent the Applicant in this opposition proceeding. The undersigned has filed a change of address and substitution on November 15, 2021. The undersigned have contacted the Opposer's counsel for the extension on November 15. However, I have received no response from the Opposer's counsel.

the Board is liberal in granting extensions of time before the period to act has elapsed so long as the moving party has not been guilty of negligence or bad faith and the privilege of

extension is not abused. *National Football League v. DNH Management LLC*, 85 USPQ2d 1852, 1854 (TTAB 2008).

Here, the undersigned office was just retained by the Applicant over the weekend and need additional time to prepare the answer or otherwise response to the pleading. The Applicant is not guilty for negligence or bad faith because the previous attorney representing the Applicant in the trademark prosecution will not represent the Applicant in this opposition proceeding due to the scope of representation. Thus, although delayed, Applicant took due diligent effort to retain a counsel for this proceeding. There is no negligence for this firm because this firm was just retained two days ago over the weekend and the notice to change address was just filed today.

The privilege of extension is not abused as parties are still at pleading stage and there is no previous extension granted or denied.

Dated: Flushing, New York
November 15, 2021

/s/ Shan Zhu
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