

ESTTA Tracking number: **ESTTA1196569**

Filing date: **03/14/2022**

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

Proceeding no.	91273570
Party	Defendant Michelson, Joan Bryna
Correspondence address	MICHELSON, JOAN BRYNA 6300 STEVENSON AVE, SUITE 716 ALEXANDRIA, VA 22304 UNITED STATES Primary email: joanmichelson@hotmail.com Secondary email(s): joan@greenconnectionsradio.com 702-806-3690
Submission	Motion for Relief from entry of Default Judgment
Filer's name	Joan B. Michelson
Filer's email	joan@greenconnectionsradio.com
Signature	/Joan B. Michelson/
Date	03/14/2022
Attachments	Default Notice Reply to Electric Lady LLC opposition 91273570 - 3-14- 2022 - submitted.pdf(83061 bytes)

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


Electric Lady, LLC,	:	
	:	
Opposer,	:	Opposition No. 91273570
	:	
v.	:	Serial No. 90612814
	:	Filed: March 30, 2021
Joan Bryna Michelson, DBA	:	Published: December 14, 2021
Green Connections Media LLC,	:	
	:	Mark: ELECTRIC LADIES
Applicant.	:	
	:	

REPLY TO NOTICE OF DEFAULT

In response to the Notice of Default filed in the above-captioned proceeding, Joan Bryna Michelson (the “Applicant”) respectfully requests that the Board not issue a Default Notice and permit her to submit her Answer to the Notice of Opposition in the above-captioned proceeding for the following reasons: Applicant was unable to respond timely due to medical reasons. Applicant was hospitalized during a period of time and under intense medical care when the Answer was due. Applicant was working significantly less on business matters, because of unexpected high risk of cardiac arrest or stroke that occurred around that time, including being rushed to the emergency room twice. Applicant’s condition has stabilized, and she is now fully able to contribute in the defense of her application.

The Opposer has not been prejudiced by Applicant's delay in providing an Answer in this proceeding, because the proceeding has just begun, and Applicant's response is only a short time past the date the Answer was due.

Applicant prays that the default be dismissed and Applicant be granted the opportunity to file its Answer in defense of its application in this proceeding.



Signed:

Dated: March 14, 2022

Joan B. Michelson, CEO
Green Connections Media LLC
6300 Stevenson Ave, Suite 716
Alexandria VA 22304
joan@greenconnectionsradio.com

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March, 2022, a copy of the foregoing [Reply To Notice Of Default Answer](#) was sent via email, to:

Laura A. Genovese, Esq.
K & G Law LLC
602 South Bethlehem Pike, Building B
Ambler, PA 19002
lgenovese@kassgen.com



Signed:

Dated: March 14, 2022