

ESTTA Tracking number: **ESTTA1234506**

Filing date: **09/08/2022**

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

Proceeding no.	91276956
Party	Defendant Long Zhang
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Submission	Other Motions/Submissions
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Date	09/08/2022
Attachments	2022-09-07 - Motion for leave to accept late filed Answer.pdf(93391 bytes )

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

**MENWITHTHEPOT F/K/A THE COOKING  
GUILD LTD.,**

Opposer,

v.

**LONG ZHANG,**

Applicant.

**Opposition No. 91276956**

**Serial No. 97/003,900**

**MOTION TO REQUEST ACCEPTANCE OF LATE-FILED ANSWER**

Pursuant to TBMP §§ 508 and 502.02(b), Applicant Long Zhang (“Applicant”), respectfully requests that its late-filed Answer, concurrently filed with this Motion, be accepted. Opposer does not oppose this Motion.

Applicant’s failure to timely file an answer is unintentional, and good cause exists to grant this motion. Applicant is an individual residing in China. The original date to answer the Notice of Opposition is August 4, 2022. The undersigned counsel was retained on August 2, 2022. A consented request for extension was filed and granted on August 3, 2022. The current deadline to answer the Notice of Opposition is this past Saturday September 3, 2022, which falls into Tuesday September 6, 2022, due to the weekend and Labor Day holiday on Monday. There is an inadvertent calendaring error by the undersigned counsel due to the weekend and holiday mix-up. Applicant’s Answer was not filed on September 6, 2022. Counsel for Applicant contacted counsel for Opposer the next day on September 7, 2022, to seek consent from Opposer for an extension or acceptance of a late-filed answer. Opposer confirmed its consent today on September 8, 2022.

For the foregoing reasons, Respondent respectfully requests that Applicant’s late filed Answer to be accepted by the Board.

DATED September 8, 2022.

Respectfully submitted,

By: /s/ Timothy T. Wang

Timothy T. Wang

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**ATTORNEY FOR APPLICANT**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **MOTION TO REQUEST ACCEPTANCE OF LATE-FILED ANSWER** has been served upon Alan F. Feeney and colleagues by forwarding said copy on September 8, 2022 via email to the email addresses on file for Opposer: Alan@FeeneyLawGroup.com, JSHyde@FeeneyLawGroup.com, Donald@FeeneyLawGroup.com, kirsten@virtuosolegal.com.

By: /s/ Timothy T. Wang

Timothy T. Wang