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Filing date: **09/11/2015**

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

Proceeding	92061918
Party	Plaintiff Quadro Der Grossbaukasten Limited, formerly known as Quadro Sued Ltd
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Date	09/11/2015
Attachments	5178-001 Response to Extension Request.pdf(18567 bytes)

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

QUADRO DER GROSSBAUKASTEN :
LIMITED (f/k/a QUADRO SUED LTD), :
 Petitioner : Cancellation No. 92061918
 v. :
VON WULFING GMBH & CO.KG and :
Q.ORIGINAL PLASTICS UG, :
 Registrants :
Box: TTAB/FEE :

**RESPONSE TO EXTENSION REQUESTS AND
STIPULATION TO 30 DAYS EXTENSION TO OCTOBER 22, 2015**

United States Patent and Trademark Office:
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Madam:

Petitioner, QUADRO DER GROSSBAUKASTEN LIMITED hereby partially opposes joint Respondents' Request for 60 Day Extensions of Time served September 4, 2015, and respectfully requests the Board to limit the extension of time to Answer to 30 days, namely, to October 22, 2015, to reset all deadlines accordingly, and to set the time to respond to the Motion to the same date.

Counsel for Respondents did not contact counsel for Petitioner for consent. As a courtesy to counsel, the undersigned would have consented to extend deadlines to October 22.

An extension of a non-expired time period requires a showing of "good cause." As the sole ground for the 60-day extension, Registrants' Request for Extension states that respondents did not retain counsel until September 4, 2015, although the Petition that was filed and served on July 28, 2015. Respondents' admitted delay and lack of diligence in retaining counsel until

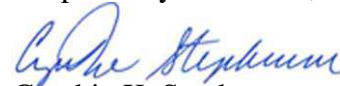
Cancellation No. 92061918

September 4 does not constitute the required showing of good cause under TBMP 509.01(a). The only articulated reason for delay and the sole ground for the request was entirely within reasonable control of the respondents. Such delay strongly suggests that respondents are indifferent to the consequences of this proceeding. Extending time to Answer by an additional 60 days, now that respondents have retained counsel, would amount to undue and unnecessary delay beyond the usual amount of time contemplated by the original time to Answer.

Nevertheless, Petitioner hereby stipulates and consents to a limited 30 days extension of time for the respondents to Answer to and including October 22, 2015, and for the Motion to Suspend to October 22, 2015.

For all of the reasons above, the TTAB is respectfully requested to grant Respondents' Motion to Suspend pending a decision in the foreign civil actions.

Respectfully submitted,


Cynthia K. Stephenson
Attorney for Petitioner

9/11/2015
Date

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing document has been served on counsel for joint respondents by mailing a copy via first-class mail September 11, 2015, to:

John L. Welch
Wolf, Greenfield & Sacks, PC
600 Atlantic Avenue
Boston, MA 02210



(Cynthia K. Stephenson)