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Filing date: **02/24/2020**

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

Proceeding	92071349
Party	Defendant Irina S. Kozodaeva
Correspondence Address	KENNETH M MOTOLENICH-SALAS MOTOSALAS LAW PLLC 16210 NORTH 63RD STREET SCOTTSDALE, AZ 85254 UNITED STATES Ken@motosalasalaw.com 202-257-3720
Submission	Motion to Extend
Filer's Name	Kenneth M. Motolenich-Salas
Filer's email	ken@motosalasalaw.com
Signature	/Kenneth M. Motolenich-Salas/
Date	02/24/2020
Attachments	dimitry_consent motion 2 weeks w ex.pdf(51072 bytes)

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

NT-MDT LLC,

Petitioner,

v.

Irina Kozodaeva,

Registrant.

Cancellation No. 92/071,349

Mark: NT-MDT Design Mark

Reg. No. 5,753,336

Filing Date: July 19, 2018

Registered: May 14, 2019

REGISTRANT'S CONSENTED MOTION TO EXTEND DEADLINE FOR CLOSE OF
DISCOVERY BY TWO WEEKS

Registrant, by and through undersigned counsel, hereby respectfully moves, with the consent of Petitioner, to extend the close of discovery by two weeks from March 13, 2020 to March 27, 2020. Registrant recently noticed a discovery deposition of an officer of Petitioner. See Exhibit 1. Petitioner's counsel indicated that the deponent may not be available that date, but instead be available the next day, which is the close of discovery. Moreover, Petitioner indicated it intended to notice a deposition of Registrant, but has yet to do so. Any such deposition would have to occur after the deposition of Petitioner's officer due to fairness in that Registrant noticed the deposition of the officer before any notice of deposition served on it by Petitioner. Moreover, Petitioner only recently served extensive discovery requests on Registrant, with responses due the last day of the current discovery period (*viz.*, March 13). Without extending the deadline to extend the close of discovery, Registrant will not be available to both supplement its already-served discovery responses and provide full and complete response to the pending discovery requests in light of the need to prepare for and take the deposition of Petitioner's officer. And, without an

extension of time, there would be no time for Petitioner to take the discovery deposition of Registrant. As such, good cause exists for extending the close of discovery by two weeks.

Dated: February 24, 2020

Respectfully submitted,

MotoSalas Law, PLLC



/Kenneth M. Motolenich-Salas/
Kenneth M. Motolenich-Salas
16210 North 63rd Street
Scottsdale, AZ 85254
Telephone: (202) 257-3720
Email: Ken@motosalasalaw.com
Counsel for Registrant Irina Kozodaeva

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2020, a true and complete copy of the foregoing has been served on counsel for Petitioner NT-MDT LLC by forwarding said copy via email to:

Lance Venable
Law Office of Lance C. Venable, PLLC
4939 West Ray Road, Suite 4-219
Chandler, AZ 85226
Telephone: (602) 730-1422
Email: lance@venableiplaw.com; uspto@venableiplaw.com



/Kenneth M. Motolenich-Salas/
Kenneth M. Motolenich-Salas

EXHIBIT 1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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NOTICE OF DEPOSITION OF VIKTOR BYKOV

Pursuant to TBMP 404 and Rule 30 of the Federal Rules of Civil Procedure, Defendant Irina Kozodaeva, by her attorneys, shall take the deposition upon oral examination of Oleg Butyaev on March 12, 2020 at 9:30 a.m. The deposition shall be recorded by stenographic means, and shall take place at the firm of Weiss & Moy, P.C., 4455 E Camelback Road, Suite E-261, Phoenix, AZ 85018, or at some other place as may be agreed upon by counsel.

Dated: February 21, 2020

Respectfully submitted,

MotoSalas Law, PLLC



/Kenneth M. Motolenich-Salas/

Kenneth M. Motolenich-Salas

16210 North 63rd Street

Scottsdale, AZ 85254

Telephone: (202) 257-3720


Email: Ken@motosalasalaw.com

Counsel for Registrant Irina Kozodaeva

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2020, a true and complete copy of the foregoing has been served on counsel for Petitioner NT-MDT LLC by forwarding said copy via email to:

Lance Venable
Law Office of Lance C. Venable, PLLC
4939 West Ray Road, Suite 4-219
Chandler, AZ 85226
Telephone: (602) 730-1422
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/_____ /

/Kenneth M. Motolenich-Salas/
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