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Filing date: **04/15/2020**

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
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Date	04/15/2020
Attachments	mtn extend time to respond to msj-.pdf(30482 bytes)

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

NT-MDT LLC,
Petitioner,
v.
Irina Kozodaeva,
Registrant.

Opposition No. 92/071,349
Mark: NT-MDT Design Mark
Reg. No. 5,753,336
Filing Date: July 19, 2018
Registered: May 14, 2019
VIA ESTTA General Filings

**Registrant Irina Kozodaeva’s Unopposed Motion to Extend Time to Respond to
Petitioner’s Motion for Summary Judgment (Second Request)**

Registrant Irina Kozodaeva (“Registrant”), by and through undersigned counsel and with the non-opposition of Petitioner as communicated through an email from Petitioner’s counsel dated April 15, 2020, respectfully moves the Board to extend the time for Registrant to respond to Petitioner’s Motion for Summary Judgment (“Motion”), from April 21, 2020 to May 5, 2020 (two weeks). The undersigned is under a stay-at-home order in Arizona along with his two young children, both of whom are being virtually homeschooled by the undersigned. This has presented a challenging environment to the undersigned in terms of balancing new demands placed on him to serve as a virtual teacher to his children and his regular work commitments. The undersigned estimates that an additional two weeks of time is needed to allow for completion of a response to the Motion in light of his other new-found obligations. As the proceeding is suspended, this extension, if granted, would not affect any of the remaining milestones in the scheduling order. This is Registrant’s second request to extend the time to respond to the Motion,¹ and the request is made for good cause.

Dated: April 15, 2020

Respectfully submitted,
MotoSalas Law, PLLC



/Kenneth M. Motolenich-Salas/


¹ At the time of making the first request to extend the time to respond to the Motion, the undersigned did not have a full appreciation of what would be involved with the shutdown of his children’s schools and the effect that this would have on his daily work life. Had the undersigned know this at the time of making the first request, the undersigned would have sought more time than the eight days sought in the first request.

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2020, I filed the foregoing via ESTTA with the Trademark Office Trademark Trial and Appeal Board and that a true and complete copy of the foregoing has been served on counsel for Petitioner NT-MDT LLC by forwarding said copy on April 15, 2020 via email to:

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