

ESTTA Tracking number: **ESTTA1088162**

Filing date: **10/13/2020**

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 Primary Email: Ken@motosalasalaw.com 202-257-3720
Submission	Other Motions/Papers
Filer's Name	Kenneth Motolenich-Salas
Filer's email	ken@motosalasalaw.com
Signature	/Kenneth Motolenich-Salas/
Date	10/13/2020
Attachments	notice re response.pdf(34891 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, Hereinafter
Referred to as “the Mark”



Reg. No. 5,753,336
Filing Date: July 19, 2018
Registered: May 14, 2019
VIA ESTTA General Filings

Notice Concerning Registrant Irina Kozodaeva’s Response to Petitioner NT-MDT LLC’s Motion

Summary Judgment

Registrant Irina Kozodaeva hereby provides notice of the filing of her response to Petitioner NT-MDT LLC’s motion for summary judgment. The response is comprised of (i) a legal argument with three appendices and (ii) eight exhibits (Exhibits A through H). Due to size constraints with ESTTA filings and to avoid the unintended blurriness that results from the reduction of file sizes using the undersigned attorney’s .pdf software (Nuance Power PDF Standard), the undersigned has broken up the response into four different papers, each of which in turn is broken up into component parts.

Paper No. 36: Paper No. 36 (legal argument and Exhibits A through C) is comprised of six files.

File No. 1: Response to Motion for Summary Judgment with Appendices (Appendices I through III) *and* Exhibit A (Declaration of Dmitry Kozodaev with all of the exhibits thereto (file name: response msj-second time around plus exhibit a.pdf)

File No. 2: Exhibit B to Response (Declaration of Rashid Magometovich Dzhaubaev (file name: EX B FINAL Declaration of Rashid Magometovich Dzhaubaev-pdf-signed with exhibits.pdf)

File No. 3: Exhibit C to Response (Declaration of Alexander Bykov (file name: Ex C bykov declaration just dec no exs.pdf)

File No. 4: Part 1 of Exhibits to Exhibit C (Exhibits 1 through 8) (file name: part 1 of exhibits to ex c.pdf)

File No. 5: Part 2 of Exhibits to Exhibit C (Exhibits 9 through 10) (file name: part 2 part 2 of exhibits to exhibit c.pdf)

File No. 6: Part 3 of Exhibits to Exhibit C (Exhibits 11 through 19) (file name: part 3 of exhibits to exhibit c.pdf)

Paper No. 37: Paper No. 37 (Exhibit D) is comprised of seven files, one of which is an index.

Part 1: Exhibit D (Declaration of Kenneth Motolenich-Salas) and Exhibits 1 through 4 thereto (file name: part 1 of ex d.pdf)

Part 2: Exhibits 5 through 12 of Exhibit D (file name: part 2 of ex d.pdf)

Part 3: Exhibit 13 of Exhibit D (KOZ 3074 through KOZ3106) (file name: CORRECTED FINAL part 3 of exhibit D.pdf)

Part 4: Part 2 to Exhibit 13 of Exhibit D (KOZ3107-KOZ3172) (file name: CORRECTED part 4 of exhibit d.pdf)

Part 5: Exhibits 14 through 16 of Exhibit D (file name: part 5 of ex d.pdf)

Part 6: Exhibits 17 through 23 of Exhibit D (file name: part 6 of exhibit d.pdf)

An index was filed with Paper No. 37 detailing the above break down.

Paper No. 38: Paper No. 38 (Exhibit E) is comprised of four files, one of which is an index.

Part 1: Exhibit E (Declaration of Irina Kozodaeva) and Exhibits 1 through 4 thereto (file name: part 1 of ex e.pdf)

Part 2: Exhibits 5 to 8 to Exhibit E (file name: part 2 of ex e.pdf)

Part 3: Exhibits 9 to 11 to Exhibit E (file name: part 3 of ex e.pdf)

An index was filed with Paper No. 38 detailing the above break down.

Paper No. 39: Paper No. 39 (Exhibits F through H) is comprised of five files, one of which is an index.

Part 1: Exhibit F (Declaration of Anastasia Aleksandrovna Yakovleva) (file name: EX F FINAL DEC OF YAKOVLEVA with exhibits-optimized.pdf)

Part 2: Exhibit G (Declaration of Peter Aleksandrovich Nechiporenko) (file name: Ex G final dec ru attorney dec-optimized.pdf)

Part 3: Exhibit H (Second Declaration of Irina Kozodaeva) and Exhibits 1 through 3 thereto (file name: part 1 of ex h-second declaration of kozodaeva and exhibits 1 through 3 thereto-optimized.pdf)

Part 4: Exhibits 4 through 6 to Exhibit H (file name: part 2 of ex h-second declaration of Kozodaeva-exhibits 4 through 6 thereto.pdf)

An index was filed with Paper No. 39 detailing the above break down.

Respectfully submitted,
MotoSalas Law, PLLC




Dated: October 13, 2020

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

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 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 October 13, 2020 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