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

Proceeding	92071359
Party	Defendant Madhuri Dixit Nene
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Submission	Motion to Extend
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Date	07/02/2019
Attachments	2019.07.02 Motion for Extension of Time to Answer TTAB.pdf(105383 bytes)

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

<p>TIMELESS SEEDS, INC.</p> <p>Petitioner</p> <p>v.</p> <p>MADHURI DIXIT NENE</p> <p>Registrant.</p>	<p>Cancellation No. 92071359</p> <p>Reg. No. 4766465</p> <p>Mark: TIMELESS BY MADHURI DIXIT</p> <p>Registration Date: July 7, 2015</p>
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**MOTION FOR EXTENSION OF
TIME TO ANSWER AND/OR OTHERWISE PLEAD**

Registrant, Madhuri Dixit Nene, through its undersigned attorney, respectfully requests an extension of time of thirty (30) days to Answer the Petition to Cancel and/or otherwise plead.

The standard for allowing an extension of a time before the expiration of the deadline for taking action is good cause. Fed. R. Civ. P. (6)(b)(1); TBMP Section 509. The Board is liberal in granting extensions of time so long as the moving party has not been guilty of negligence or bad faith, and the privilege of extensions is not abused. *Am. Vitamin Prods. Inc. v. DowBrands Inc.*, 22 USPQ2d 1313, 1314 (TTAB 1992); *National Football League v. DNH Management LLC*, 85 USPQ2d 1852, 1854 (TTAB 2008) (“the Board is liberal in granting extensions of time before the period to act has elapsed so long as the moving party has not been guilty of negligence or bad faith and the privilege of extension is not abused”).

Registrant submits that good cause exists to grant an extension in this case. This motion is not filed for purposes of delay, and it is the first extension sought by

Registrant. Due to an administrative docketing issue, Registrant's counsel was not made aware of the cancellation petition until today. Also, even though the Petition to Cancel contains a Certificate of Service indicating that a copy of the Petition to Cancel was sent to Registrant's counsel by first class mail, Registrant's counsel never received a copy of the Petition to Cancel by mail.

As Registrant is a foreign individual, Registrant's counsel needs additional time to confer with Registrant about the Petition to Cancel. Under the circumstances, an extension is warranted to allow Registrant time to consider the Petition to Cancel. Counsel for Registrant has contacted counsel for Petitioner today to seek consent to an extension, but has not yet received a response.

Accordingly, Registrant respectfully requests that the Board grant this motion, extend Registrant's Answer deadline, and reset all remaining dates.

Respectfully Submitted,

Dated: July 2, 2019

/Naresh Kilaru/
Naresh Kilaru
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2019 a true and correct copy of the foregoing
MOTION FOR EXTENSION OF TIME TO ANSWER AND/OR OTHERWISE PLEAD
was served by email, on counsel for Opposer at the following address of record:

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