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March 16, 2015

VIA CERTIFIED MAIL

Trademark Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1451 Alexandria, VA 22313/1451

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Re: Serial No's. 86416412 and 86416038

Dear Sir or Madam:

This law firm represents GLOCK, Inc.

GLOCK, Inc. recently had two trademarks published for opposition with the USPTO. These two trademarks, G17 and G18, correspond to the above-referenced serial numbers. On March 5, 2015, Kent Wu of The Wuster, filed a 90 day request for extension of time to oppose both trademarks for good cause. These motions were granted by the TTAB. Enclosed, please find GLOCK, Inc.'s request for reconsideration regarding the extension of time granted for both serial numbers.

As neither of these matters has been assigned opposition numbers, customer service advised that we send in our motions via certified mail.

We appreciate your consideration in this matter. Please do not hesitate to contact us with any questions.

Very truly yours,

RENZULLI LAW FIRM, LLP

03-23-2015 U.S. Patent & TMOfc/TM Mail Ropt Dt. #22

Julianna E. Orgel-Eaton

Julianna E. Orgel-Eaton

cc: John F. Renzulli, Esq.

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

In the matter of Serial No. 86416038 Date of Publication: March 3, 2015 For the mark: G17

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Kent Wu,)
Opposer,)) Application Serial No. 86416038
v.	
GLOCK, Inc.,	
Applicant.)

REQUEST FOR RECONSIDERATION

GLOCK, Inc. ("Applicant") by its attorneys, Renzulli Law Firm, LLP, requests that pursuant to § 211.01 of the TBMP, the Board reverse its March 5, 2015 decision to grand an extension of time to Kent Wu ("Opposer").

Opposer requested a 90 day extension of time to oppose Applicant's trademark for good cause. According to Opposer, he believes good cause is established because "the potential opposer is engaged in settlement discussions with applicant." Applicant responds to this request to notify the Board that this claim is false information which has no basis in fact. Applicant and/or his attorney have never contacted GLOCK or this office for any reason. Applicant believes that this is a tactic by Opposer to harass Applicant and delay its trademark registration without good cause.

Applicant is the plaintiff in a trademark and patent infringement lawsuit against Opposer's company, The Wuster (1:14 cv-00568 AT) in the Northern District of Georgia. At issue in this lawsuit is Opposer's infringing use of Applicant's intellectual property, including but not limited to, the G17 trademark. This lawsuit is in its early stages of discovery and there have been no settlement discussions.

CONCLUSION

It is clear that Opposer has filed this extension of time in bad faith. Opposer has espoused unmitigated untruths and is attempting to obtain a benefit from the Board to which he is not entitled.¹ Applicant submits that based on the facts, it would be unjust to allow Opposer to have a 90 day extension of time. For the foregoing reasons, Applicant respectfully requests that the Board reverse its decision.

Respectfully submitted this 16th Day of March, 2015.

By: <u>/s/ Julianna E. Orgel-Eaton</u> John F. Renzulli Julianna E. Orgel-Eaton **RENZULLI LAW FIRM, LLP** 81 Main Street, Suite 508 White Plains, NY 10601 Telephone: (914) 285-0700 Facsimile: (914) 285-1213 jorgel@renzullilaw.com

Attorneys for Applicant, GLOCK, Inc.

¹ Central Manufacturing Inc. v. Third Millennium Technology Inc., 61 USPQ2d 1210 (TTAB 2001).

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