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

Proceeding	91206162
Party	Plaintiff Miss America Organization
Correspondence Address	CHARLES N QUINN FOX ROTHSCHILD LLP 747 CONSTITUTION DRIVE, SUITE 100 EXTON, PA 19341 UNITED STATES cquinn@foxrothschild.com, dmcgregor@foxrothschild.com, jdiguglielmo@foxrothschild.com, ipdocket@foxrothschild.com
Submission	Motion to Extend
Filer's Name	CHARLES N. QUINN
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Signature	/Charles N. Quinn/
Date	02/11/2015
Attachments	11 FEB. 2015 MOTION TO EXTEND DATES.PDF(120546 bytes) 11 FEB. 2015 DECLARATION IN SUPPORT OF MOTION TO EXTEND DATES.PDF(118870 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

Miss America Organization	:	
	:	
Opposer	:	
v.	:	Opposition 91206162
	:	
	:	Application 85/414,806
	:	
Jessica Lee Bodge	:	Mark: LITTLE MISS OF AMERICA
	:	
Applicant	:	

**MOTION BY OPPOSER MISS AMERICA ORGANIZATION TO RESET DATES AND
EXTEND COMMENCEMENT OF OPPOSER’S TESTIMONY PERIOD**

This is a Motion by Opposer, the Miss America Organization (hereinafter referred to as “Miss America”) to reset dates thereby extending the date for commencement of Miss America’s testimony period by sixty (60) days.

Miss America’s testimony period is currently scheduled to open on 27 February and to close thirty days later, on 28 March 2015.

This Motion is necessitated by Miss America’s counsel’s representation in defending another client in patent infringement litigation.

As a by-product of representing the defendant in on-going patent infringement litigation over the past thirteen (13) months in the United States District Court for the District of New Jersey (the case is captioned *Ronald Mark Associates v. StonCor Group, Inc.*, cv 13-7446), Miss America’s counsel has been unable adequately to prepare for taking testimony on behalf of Miss America. The attached declaration by Miss America’s counsel presents in detail some, but not all, of the activity in the *Ronald Mark v. StonCor* matter that has caused Miss America’s undersigned counsel to need additional time to prepare for taking testimony on behalf of Miss

America, and to take that testimony. Miss America respectfully requests that Miss America be granted sixty (60) additional days to prepare to take testimony. If the instant Motion is granted, the new schedule for proceeding would be as follows:

Plaintiff's 30-day Trial Period Ends	5/28/2015
Defendant's Pretrial Disclosures	6/12/2015
Defendant's 30-day Trial Period Ends	7/27/2015
Plaintiff's Rebuttal Disclosures	8/11/2015
Plaintiff's Rebuttal Period Ends	9/11/2015

As detailed in the accompanying declaration of Miss America's counsel, Miss America has tried, without success, to contact the Applicant, Miss Bodge, to solicit her consent to this motion. Miss Bodge had not returned any of Miss America's undersigned counsel's email messages or calls. Accordingly, Miss America cannot represent that this motion has the consent of the Applicant.

Miss America respectfully requests notification of the grant of this Motion so that Miss America can effectively present its case in a most persuasive manner.

Respectfully submitted,

FOX ROTHSCHILD LLP

/Charles N. Quinn/

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Attorneys for Opposer, the Miss America Organization

Dated: 11 February 2015

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

Miss America Organization	:	
	:	
v. Opposer	:	Opposition 91206162
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Jessica Lee Bodge	:	Mark: LITTLE MISS OF AMERICA
	:	
Applicant	:	
	:	

DECLARATION OF CHARLES N. QUINN

1. I, Charles N. Quinn, hereby declare that I am a citizen of the United States, residing at 419 Bowen Drive, Exton, Pennsylvania, 19341, a partner in the law firm of Fox Rothschild LLP having my principal office at 747 Constitution Drive, Suite 100, Exton, Pennsylvania, 19341, a member in good standing of the Bar of the Supreme Court of the Commonwealth of Pennsylvania holding registration number 17,603 therein, admitted in good standing to practice in patent matters before the United States Patent and Trademark Office pursuant to registration 27,223, and am the attorney of record for the Opposer, Miss America Organization, in the above-referenced matter.

2. I have represented StonCor Group, Inc. and its predecessors-in-interest in intellectual property matters for nearly 30 years.

3. StonCor Group was sued for patent infringement a little over one year ago. I am the principal lawyer defending StonCor against the charge of patent infringement in that matter. The case is *Ronald Mark Associates, Inc. v. StonCor Group, Inc.*, civil action 13-7446, pending in the United States District Court for the District of New Jersey, in Camden, New Jersey. My

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