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

Proceeding	92067046
Party	Defendant Nationwide Auto Lease LLC
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Submission	Opposition/Response to Motion
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Date	03/20/2020
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Registration Registration No. 5,005,305 Registered: July 19, 2016 Mark: NATIONWIDE AUTO LEASE	Cancellation No. 92067046
NATIONWIDE MUTUAL INSURANCE COMPANY, Petitioner, -vs- NATIONWIDE AUTO LEASE LLC, Registrant.	PRILIMINARY RESPONSE TO PETITIONER'S SECOND MOTION FOR JUDGMENT AS A SANCTION

Registrant hereby preliminary responds to Petitioner's Second Motion For Sanctions, filed 03/20/2020 (today) ("Petitioner's Current Motion").

I, the undersigned, Registrant's attorney of record on this matter, am preparing this Response at 6:00 pm EDT on 03/20/2020. Less than one-half (1/2) hour ago, I received both (1) a notification of Petitioner's Current Motion by e-mail from the TTAB and (2) a copy of the Current Motion directly from Petitioner's attorney.

Until I received a copy of Peititioner's Current Motion, I was unaware of the 03/05/2020 TTAB Order in this matter ("03/05 TTAB Order").

Even though I am Registrant's attorney of record on this matter, I never received a copy of the 03/05 TTAB Order, either from the TTAB or from

Petitioner's attorney. I have even checked my junk/spam e-mail folder, which contains nothing regarding this 03/05 TTAB Order.

Prior to receiving Petitioner's Current Motion, I did receive from the TTAB notification of the 02/27/2020 TTAB Order, at which time I reviewed that Order.

Meanwhile, Registrant, by this Preliminary Response, respectfully requests that Petitioner consents to ask the TTAB to begin anew the ten (10) day consultation period set forth in the 03/05 TTAB Order.

Alternatively, Registrant respectfully requests that Petitioner's Current Motion be denied, and that the TTAB begin anew the ten (10) day consultation period set forth in the 03/05 TTAB Order.

Registrant may supplement this Preliminary Response, after Registrant and I have more time to investigate this matter.

Thank you.

Respectfully submitted,

LAW OFFICES OF MITCHELL P. NOVICK

By: /mitchell p. novick/
MITCHELL P. NOVICK, ESQ.
Reg. No. 30,305

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Dated: March 20, 2020

MPN/s
2068-1939

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PRELIMINARY RESPONSE TO PETITIONER'S SECOND MOTION FOR JUDGMENT AS A SANCTION has been served upon the attorney of record for Petitioner by e-mail to the following address, on March 20, 2020:

Martin Miller, Esq.
PORTER, WRIGHT, MORRIS & ARTHUR LLP
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/mitchell p. novick/

MITCHELL P. NOVICK

Dated: March 20, 2020