



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

TTAB

Bridgestone/Firststone Research, Inc.

Opposer,

v.

Wirestone LLC,

Applicant

(by assignment and name change)

Opposition No. 91/122,110

Application Serial No. 75/839,980

OPPOSER'S CONSENTED TO MOTION FOR A ONE HUNDRED TWENTY (120)
DAY EXTENSION OF DISCOVERY AND TRIAL DATES

Opposer respectfully requests a one hundred twenty (120) day extension of the discovery deadline and all subsequent trial dates.

This extension request is submitted in good faith and not for purposes of delay. In this regard, the parties have scheduled a settlement conference for September 27, 2004, which conference will be attended both by counsel and also by principals from both sides. The requested extension is necessary to accommodate this upcoming settlement conference and thereafter to leave sufficient time for the parties to work toward completing discovery, if, following the conference, it then appears that settlement is unlikely.



08-24-2004

Accordingly, Opposer respectfully moves that the Board extend the close of the discovery period in these proceedings by one hundred twenty days, to and including **January 2, 2005**. It is further requested that all subsequent dates and deadlines in this proceeding be re-set by one hundred twenty days as follows:

30-day Testimony Period
for party in position of
Plaintiff to close: April 2, 2005

30-day Testimony Period
for party in position of
Defendant to close: June 1, 2005

15-day rebuttal Testimony
Period for party in Plaintiff
to close: July 16, 2005

Applicant's counsel, Jonathan Z. King, has consented to this extension request.

In view of the foregoing, favorable action on this consented motion is respectfully requested.

Respectfully submitted,



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Attorneys for Opposer

Dated: August 24, 2004

CERTIFICATE OF SERVICE

I hereby certify that the foregoing OPPOSER'S CONSENTED TO MOTION FOR A ONE HUNDRED TWENTY (120) DAY EXTENSION OF DISCOVERY AND TRIAL DATES was served on counsel for Applicant this 24th day of August, 2004, by facsimile and mailing a true copy thereof via First Class U.S. Mail, postage prepaid, addressed to the following:

Mr. Jonathan Z. King, Esq.
Cowan, Liebowitz & Latman
1133 Avenue of the Americas
New York, NY 10036

By:



Peter G. Mack
Foley & Lardner LLP