

# TTAB

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

PRECISION TRADING CORP., )  
)  
Opposer, )  
)  
v. ) Opp. No. 91158951  
)  
BSH HOME APPLIANCES CORPORATION, )  
)  
Applicant. )

### AGREED MOTION FOR EXTENSION OF TIME

Applicant, with the consent of opposer, moves that the discovery period and all subsequent testimony periods be extended for an additional ninety (90) days as set forth below:

THE PERIOD FOR DISCOVERY TO CLOSE:	January 3, 2005
30-day testimony period for party in position of plaintiff in the cancellation to close:	April 3, 2005
30-day testimony period for party in position of defendant in the cancellation and plaintiff in the counterclaim to close:	June 2, 2005
30-day rebuttal testimony period for plaintiff in the cancellation and defendant in the counterclaim to close:	August 1, 2005
15-day rebuttal testimony period for plaintiff in the counterclaim to close:	September 14, 2005
Brief for plaintiff in the cancellation shall be due:	November 14, 2005
Brief for defendant in the cancellation and plaintiff in the counterclaim shall be due:	December 13, 2005
Brief for defendant in the counterclaim and reply brief, if any, for plaintiff in the cancellation shall be due:	January 13, 2006



09-30-2004

U.S. Patent & TMOtc/TM Mail Rcpt Dt. #72

#### Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Trademarks, 2900 Crystal Drive, Arlington, Virginia 22202-3514 on September 27, 2004.

*Stephanie M. Vreles*

Reply brief, if any, for plaintiff in the counterclaim  
shall be due:

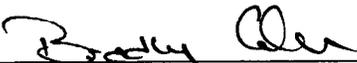
January 28, 2006

The parties are pursuing discovery, and the extension is requested to permit the parties to continue with their discovery efforts and to permit the parties additional time to explore possible settlement.

It is respectfully submitted that this constitutes good cause for the requested extension. Applicant's counsel and Opposer's counsel, Gregg Reed, agreed to this requested extension on September 9, 2004.

Respectfully Submitted,

PATTISHALL, McAULIFFE, NEWBURY,  
HILLIARD & GERALDSON LLP

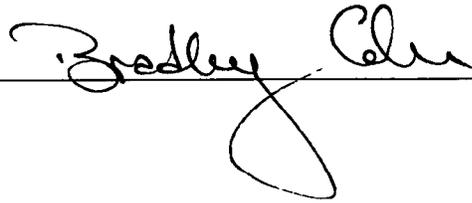
By 

Raymond I. Geraldson, Jr.  
Bradley L. Cohn  
Manuel Herrera  
311 South Wacker Drive  
Suite 5000  
Chicago, Illinois 60606  
(312) 554-8000

Attorneys for Applicant,  
BSH Home Appliances Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of **AGREED MOTION FOR EXTENSION OF TIME** was served upon Gregg Reed, Esq., KLUGER, PERETZ, KAPLAN & BERLIN, P.L., 201 S. Biscayne Blvd., 17<sup>th</sup> Floor, Miami, Florida, 33131, by first class mail, on this <sup>27<sup>th</sup></sup> day of September, 2004, postage prepaid.

A handwritten signature in cursive script, reading "Bradley Chen", is written over a horizontal line. The signature is fluid and extends below the line with a large loop.