

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

In the Matter of Application No.: 76/570,501
Of the Mark: 167 NEW BOND STREET - LONDON - (Stylized)
Applicant: Asprey Holdings Limited Corporation

TTAB

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Laurice El Badry Rahme Ltd. dba :
Laurice & Co., :

Opposer :

Opposition No.: 91167945

v. :

Asprey Holdings Limited Corp., :

Applicant :



12-08-2006

U.S. Patent & TMOfc/TM Mail Rept Dt. #22

**MOTION FOR 30 DAY EXTENSION OF TIME FOR RESPONDING TO
APPLICANT'S INTERROGATORIES, APPLICANT'S REQUESTS FOR
ADMISSION and APPLICANT'S DOCUMENT REQUESTS**

Opposer, through its undersigned counsel moves that the Board grant Opposer an additional 30 days, namely from December 8, 2006 until January 7, 2007 to respond (or otherwise move) to Applicant's Interrogatories, Applicant's Requests for Admission and Applicant's Document Requests.

On November 3, 2006, the date discovery was set to close in the above-proceeding, Applicant served Opposer with a first set of discovery requests, consisting of 22 Interrogatories (not including subparts), 27 Document Requests, and 610 Requests for Admission.¹

On November 22, 2006, counsel for Opposer left a telephone message and sent an e-mail to Terence Dixon, counsel for Applicant, requesting a 30 day extension of time for responding to the outstanding discovery requests. Opposer indicated that such an extension of time was necessary because of the large amount of information requested by Applicant in its discovery requests.

On November 22, 2006, counsel for Applicant corresponded with the undersigned and

¹ A detailed narrative of the facts in the proceeding leading to this motion is set forth in Opposers' Reply to Applicant's Brief in Opposition to Oposer's Motion for Suspension of Proceeding or for an Extension of Time dated December 4, 2006.

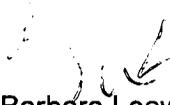
indicated that he would need to consult with his client before agreeing or declining to our request. On December 4, 2006, counsel for Applicant corresponded with the undersigned and advised that its client refused to agree to an extension of time. A copy of the foregoing correspondence is attached as Exhibit "A".

In view of the large amount of information and material requested, including 610 Requests for Admission, it is requested that the Board agree to the foregoing Extension Request.

Dated: December 6, 2006

Respectfully submitted,

GOTTLIEB, RACKMAN & REISMAN, P.C.


Barbara Loewenthal
Attorney for Opposer
270 Madison Avenue
New York, NY 10016

CERTIFICATE OF MAILING

I hereby certify that this MOTION FOR 30 DAY EXTENSION OF TIME FOR RESPONDING TO APPLICANT'S INTERROGATORIES, APPLICANT'S REQUESTS FOR ADMISSION and APPLICANT'S DOCUMENT REQUESTS is being deposited with the United States Postal Service as first class mail in a postage prepaid envelope addressed to: Commissioner for Trademarks, Box TTAB - No Fee, P.O. Box 1451, Alexandria, Virginia 22313-1451 on December 6, 2006.

Dated: December 6, 2006


Madelin Rowland

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION FOR 30 DAY EXTENSION OF TIME FOR RESPONDING TO APPLICANT'S INTERROGATORIES, APPLICANT'S REQUESTS FOR ADMISSION and APPLICANT'S DOCUMENT REQUESTS, was served on Terrence A. Dixon, Esq., Applicant's counsel of record on December 6, 2006, via first class mail, postage prepaid, addressed as follows:

Terrence A. Dixon, Esq.
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808

Dated: December 6, 2006


Madelin Rowland

Exhibit A

Barbara Loewenthal

From: Dixon, Terence [terence.dixon@dechert.com]
Sent: Monday, December 04, 2006 10:27 AM
To: Barbara Loewenthal
Cc: George Gottlieb
Subject: RE: Laurice El Badry Rahme Rahme Ltd. dba Laurice & Co. v. Asprey Holdings Ltd

Dear Barbara,

Further to my email below, I confirm that our client is not willing to agree to an extension of time for you to respond to the pending discovery requests. As I have indicated previously, our client's position with respect to this entire proceeding is clear.

Regards.

Terry

Terence A. Dixon
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
Direct: +1 215 994 2420
Main: +1 215 994 4000
Fax: +1 215 655 2420
terence.dixon@dechert.com
www.dechert.com

From: Dixon, Terence
Sent: Wednesday, November 22, 2006 3:35 PM
To: Barbara Loewenthal
Cc: George Gottlieb
Subject: RE: Laurice El Badry Rahme Rahme Ltd. dba Laurice & Co. v. Asprey Holdings Ltd

Dear Barbara,

I will have to take up your request with my colleagues in London and the client. I hope to be back to you next week. I note, however, that your responses are not due until December 8th, which still gives you over two weeks in which to prepare responses.

On a personal level, I wish you a very happy Thanksgiving.

Regards,

Terry

From: Barbara Loewenthal [mailto:bloewenthal@grr.com]

12/5/2006

Sent: Wed 11/22/2006 3:25 PM

To: Dixon, Terence

Cc: George Gottlieb

Subject: Laurice El Badry Rahme Rahme Ltd. dba Laurice & Co. v. Asprey Holdings Ltd

Dear Terence:

In accordance with my voice message we have been reviewing your discovery requests carefully. Given the large amount of information contained therein we request that you agree to provide us with a 30 day extension of time to respond or to otherwise object to the same.

Thank you.

Barbara Loewenthal

This e-mail is from Dechert LLP, a law firm, and may contain information that is con

12/5/2006