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

Proceeding	91168628
Party	Defendant Samsung Electronics Co., Ltd. Samsung Electronics Co., Ltd. #416, Maetan-dong Yeongtong-gu, Suwon-si KRX Gyeonggi-do,
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Submission	Stipulated/Consent Motion to Extend
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Date	11/06/2006
Attachments	Second Motion Extend Discovery Period.pdf (3 pages)(111781 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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Kabushiki Kaisha Hitachi Seisakusho)	
d/b/a Hitachi, Ltd.,)	
)	
Opposer,)	Consolidated Opposition No. 91168566
)	(Consolidated with Opposition No. 91168628)
v.)	
)	
Samsung Electronics Co., Ltd.,)	Serial Nos. 78/453,552
)	78/453,589
)	
Applicant.)	

**SECOND CONSENTED MOTION FOR THIRTY-DAY EXTENSION
TO DISCOVERY PERIOD AND REMAINING DEADLINES**

Applicant hereby moves for a thirty-day extension of the discovery period set by the Trademark Trial and Appeal Board in connection with the above-captioned Opposition. Discovery was set to close in this Opposition on November 3, 2006, but Applicant filed a consented motion for a thirty-day extension of the discovery period on that same day. With Opposer's consent, Applicant hereby moves for an additional thirty-day extension of the discovery period.

After the discovery period opened in the Opposition, both Applicant and Opposer served the other side with interrogatories and document requests, and both parties have served the other side with written responses to these requests. The parties have worked diligently during the discovery period to issue discovery requests and to prepare discovery responses. However, due to the complexity of the Opposition, due to the fact that both parties are located in Asia, and because additional time is needed to consider the necessity of issuing follow-up interrogatories and document requests, and to possibly request that the Trademark Trial and Appeal Board approve a Protective Order before production of certain documents, the parties have agreed to

move the Board to extend the discovery period by a total of sixty days. Extending the discovery period by sixty days will require moving the remaining trial deadlines, too.

As stated above, Applicant requests that the discovery period in the above-captioned Opposition be extended by a thirty days (in addition to the thirty days requested on November 3, 2006), and that the deadlines in the Opposition be set as follows:

Discovery period to close:	January 2, 2007
Testimony period for party in position of plaintiff to close:	April 2, 2007
Testimony period for party in position of defendant to close:	June 1, 2007
Rebuttal testimony period to close:	July 16, 2007

Counsel for the Opposer consented to this motion during a telephone conversation with the undersigned on November 6, 2006.

Date: November 6, 2006

Respectfully submitted,



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CERTIFICATE OF ELECTRONIC TRANSMISSION AND SERVICE BY MAIL

I hereby certify that a copy of the attached CONSENTED MOTION FOR THIRTY-DAY EXTENSION TO DISCOVERY PERIOD was filed electronically with the Trademark Trial and Appeal Board on November 6, 2006, and was served on counsel for Opposer via Federal Express and facsimile on November 6, 2006 to the following address:

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