

ESTTA Tracking number: **ESTTA301631**

Filing date: **08/18/2009**

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

Proceeding.	91181143
Applicant	Defendant MBL/TIGI PRODUCTS, LP
Other Party	Plaintiff Renee Claire Inc.

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 08/29/2009. MBL/TIGI PRODUCTS, LP requests that such date be extended for 60 days, or until 10/28/2009, and that all subsequent dates be reset accordingly.

Time to Answer :	10/28/2009
Deadline for Discovery Conference :	11/27/2009
Discovery Opens :	11/27/2009
Initial Disclosures Due :	12/27/2009
Expert Disclosure Due :	04/26/2010
Discovery Closes :	05/26/2010
Plaintiff's Pretrial Disclosures :	07/10/2010
Plaintiff's 30-day Trial Period Ends :	08/24/2010
Defendant's Pretrial Disclosures :	09/08/2010
Defendant's 30-day Trial Period Ends :	10/23/2010
Plaintiff's Rebuttal Disclosures :	11/07/2010
Plaintiff's 15-day Rebuttal Period Ends :	12/07/2010

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *The application which is the subject of this opposition proceeding was recently assigned to Unilever plc as part of a corporate transaction. (See assignment recorded at Reel/Frame No. 4035/0335 on July 31, 2009.) Our firm has now taken over representation of this matter and, due to the long history of the proceeding, we have just been able to complete our review of all of the relevant documents. We have spoken with counsel for the Opponent today regarding the status of this matter and she has consented via telephone to this extension request to allow us time to confer with our respective clients as to the issues relating to this opposition and a possible amicable resolution of the matter. Based upon the foregoing, Applicant asserts there is good cause for submitting this extension request and respectfully requests the Board grant this request.*

MBL/TIGI PRODUCTS, LP has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

MBL/TIGI PRODUCTS, LP has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address

record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/lwr/

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