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Filing date: **02/19/2009**

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

Proceeding	91181994
Party	Plaintiff The Federation Of The Swiss Watch Industry
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Submission	Stipulated/Consent Motion to Reopen
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Signature	/Abigail Rubinstein/
Date	02/19/2009
Attachments	Motion to Reopen Discovery and Extend All Dates - THIS ONE.PDF (3 pages) (19999 bytes)

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

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FEDERATION OF THE SWISS WATCH INDUSTRY,	:	
	:	Opposition No. 91181994
	:	(Serial No. 77/230,495)
Opposer,	:	SWISS MILITARY CALIBRE
	:	
v.	:	Opposition No. 91182730
	:	(Serial No. 77/242,894)
FIRST SBF HOLDING, INC.,	:	SWISS CALIBRE
MILITARY	:	
	:	
Applicant.	:	Opposition No. 91181746
	:	(Serial No. 77/217,985)
	:	SWISS CALIBRE
-----X		

**CONSENTED MOTION TO REOPEN DISCOVERY
AND EXTEND TESTIMONY DATES**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and in accordance with the Trademark Trial and Appeal Board Manual of Procedure § 509, the parties hereby move, on consent, for an Order reopening the discovery period for sixty days and to extend all dates as set forth below:

	<u>Current Date</u>	<u>Extended Date</u>
Discovery to Close	January 5, 2009	March 6, 2009
Plaintiff's Pretrial Disclosures	February 19, 2009	April 20, 2009
30-day testimony period for Plaintiff's testimony to close	April 5, 2009	June 4, 2009
Defendant/Counterclaim Plaintiff's Pretrial Disclosures	April 20, 2009	June 19, 2009
30-day testimony period for Defendant and Plaintiff in the counterclaim to close	June 4, 2009	August 3, 2009
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due	June 19, 2009	August 18, 2009
30-day testimony period for Defendant	August 3, 2009	October 2, 2009

	<u>Current Date</u>	<u>Extended Date</u>
in the counterclaim and rebuttal testimony for Plaintiff to close		
Counterclaim Plaintiff's Rebuttal Disclosures Due	August 18, 2009	October 17, 2009
15-day rebuttal period for Plaintiff in the counterclaim to close	September 17, 2009	November 16, 2009
Brief for Plaintiff due	November 16, 2009	January 15, 2010
Brief for Defendant and Plaintiff in the counterclaim due	December 16, 2009	February 14, 2010
Brief for Defendant in the counterclaim and reply brief, if any, for Plaintiff due	January 15, 2010	March 16, 2010
Reply brief, if any, for Plaintiff in the counterclaim due	January 30, 2010	March 31, 2010

This Motion is made for good cause and not for the purposes of delaying the proceedings before the Trademark Trial and Appeal Board. The parties are actively engaging in discovery, however additional time is needed to review recently produced documents and complete discovery.

Counsel for Applicant has consented to the reopening of discovery and extension of all dates in an email on February 19, 2009.

Respectfully submitted,

DARBY & DARBY P.C.

By: 
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Dated: February 19, 2009
 New York, NY

Attorneys for Opposer
 Federation Of The Swiss
 Watch Industry

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 19, 2009, a copy of the foregoing CONSENTED MOTION TO REOPEN DISCOVERY AND EXTEND ALL DATES was served by first class mail, postage prepaid on Applicant's counsel, addressed as follows:

Joel Weiss, Esq.
Edward M. Arons, Esq.
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Attorneys for Applicant
First SBF Holding, Inc.

Date: February 19, 2009
