

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

Serial No.: 77/269,747  
Mark: ENGLISH ACCENTS

TTAB

ROBBIE CALVO )  
 )  
 Opposer, )  
 )  
 v. ) Opposition No. 91183877  
 )  
 SHEILAH C. GRIGGS )  
 )  
 Applicant. )

**APPLICANT'S RESPONSE TO OPPOSER'S MOTION**  
**FOR DISCOVERY CONFERENCE**

Applicant Sheilah C. Griggs ("Applicant") responds to Opposer's motion for a discovery conference as follows:

Initially, Opposer seeks to require a discovery conference long after the date for same set by the Board in its Scheduling Order dated May 3, 2008. Additionally, the motion filed on January 23, 2009 is well after the discovery deadline which passed on January 8, 2009. Therefore, the motion is improper as untimely.

Secondly, as the Board is well aware, a motion to extend should only be granted with good cause and a motion to reopen requires a higher showing. The only showing made by Opposer is that he attempted to contact Applicant several times in unspecified ways about unspecified topics. Therefore, Applicant submits that good cause has not been shown by Opposer.

Therefore, the motion for a discovery conference should be denied.



02-04-2009

Respectfully submitted,

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