ESTTA Tracking number: **ESTTA229443**
Filing date: **08/08/2008**

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

Proceeding	91183877
Party	Plaintiff Mr.RobbieCalvo
Correspondence Address	Melissa M. Allen Attorney At Law 3200 West End Avenue, Suite 500 Nashville, TN 37203 UNITED STATES nashvillelaw@yahoo.com
Submission	Motion to Extend
Filer's Name	Melissa M. Allen
Filer's e-mail	nashvillelaw@yahoo.com
Signature	/Melissa M. Allen/
Date	08/08/2008
Attachments	Motion.To.Extend.TTAB.Deadlines.08.08.08.pdf (4 pages)(934460 bytes)

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

In the matter of:	Federal Trademark Application by Sheilah C. Griggs
Serial Number:	77269747
Filed:	August 31, 2007
Mark:	ENGLISH ACCENTS
Published in the *Official Gazette*:	March 4, 2008

Robbie Calvo, an individual	)	
	)	
Plaintiff/Opposer,	)	
	)	Ser. No. 77269747
	)	
v.	)	Opposition No. 91183877
	)	
Sheilah C. Griggs,	)	
	)	
Defendant/Applicant.	)	

OPPOSER'S MOTION TO EXTEND ALL DEADLINES IN PROCEEDINGS

Commissioner for Trademarks
Trademark Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1451
Alexandria, VA 22313-1451

Sir:

COMES NOW Opposer Robbie Calvo, an individual, pursuant to TTAB Practice and Procedure § 3:60, "Issuance of Trial Order", and § 3:65, "Extensions of Time to Take Discovery", and does move this Board to take the following action to wit:

1. By the TTAB Notice to the parties hereto of May 3, 2008 this Board did set all deadlines relevant to these proceedings. Opposer does move this Board to continue all deadlines by sixty (60) days on the following grounds:

A. By said TTAB Notice, the deadline for the Applicant to file its Answer was June 12, 2008. However, Applicant filed its Answer July 11, 2008, almost thirty (30) days after the TTAB deadline of June 12, 2008. This was one day prior to the deadline of July 12, 2008 set by the TTAB for both Discovery Conference and Discovery opening.

B. As of its most recent filing, Applicant was not represented by counsel. Since Opposer's counsel must correspond with an unrepresented party, Opposer's counsel must proceed with greater formality in communicating with Applicant than with an opposing counsel. Thus, communication between the parties must be in writing and requires additional time than would be the case between two (2) opposing counsel. Opposer's counsel did attempt to seek a consent order as to this Motion was Applicant did not respond thereto, thus necessitating this Motion.

2. Opposer requests that all subsequent deadlines in the TTAB Notice be continued for sixty (60) days as follows:

Nature of Proceeding:	**Proposed New Deadline:**
Deadline for Discovery Conference:	September 12, 2008
Discovery Opens:	September 12, 2008
Initial Disclosures Due:	October 11, 2008

Expert Disclosures Due:	February 9, 2009
Discovery Closes:	March 8, 2009
Plaintiff's Pre-Trial Disclosures:	April 22, 2009
Plaintiff's 30-day Trial Period Ends:	June 8, 2009
Defendant's Pretrial Disclosures:	June 23, 2009
Defendant's 30-Day Trial Period Ends:	August 7, 2009
Plaintiff's Rebuttal Disclosures:	August 22, 2009
Plaintiff's 15 day Rebuttal Period Ends:	September 22, 2009

3. This motion is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE Opposer Calvo respectfully requests that the Trademark Trial and Appeal Board grant this Motion.

Date: August 8, 2008.

Respectfully submitted,

Melissa M. Allen
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CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of this document has been filed with the Trademark Trial and Appeal Board electronically through its website and that a true and correct copy hereof has been served on Applicant/Defendant by mailing via first class pre-paid U.S. Mail to:

Ms. Sheilah C. Griggs
c/o Point 3 Media, & Idiom Entertainment
1305 Clinton Street, Suite 300
Nashville, TN 37203

as of the 8th day of August, 2008

Melissa M. Allen