

ESTTA Tracking number: **ESTTA255165**

Filing date: **12/15/2008**

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

Proceeding	91185677
Party	Plaintiff Trek Bicycle Corporation
Correspondence Address	Mary Catherine Merz Merz & Associates, P.C. 1140 Lake Street, Suite #304 Oak Park, IL 60301-1051 UNITED STATES docket@merz-law.com
Submission	Stipulated/Consent Motion to Extend
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Date	12/15/2008
Attachments	22620-consent2.pdf ( 3 pages )(12307 bytes )

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

In the Matter of U.S. Application Serial No. 77/277445  
For: BONAGE and Design  
Date of Publication: July 29, 2008

TREK BICYCLE CORPORATION	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91185677
	)	
BONAGE INC., S.A.	)	
	)	
Respondent.	)	

**CONSENTED MOTION TO EXTEND DEADLINE FOR  
INITIAL DISCLOSURES UNDER FEDERAL RULE 26(A)(1)  
AND OTHER DISCOVERY AND TESTIMONY DATES**

The parties' initial disclosures currently are due by December 15, 2008. However, the parties are discussing settlement possibilities which may preclude the need for discovery.

In a telephone conversation on December 15, 2008, counsel for opposer, Bruce Haraguchi, and counsel for applicant, H. Jay Spiegel, stipulated that initial disclosures be postponed for an additional 60 days pending settlement discussions, and that the discovery and testimony periods likewise be extended by 60 days.

This consented motion is being filed to seek the Board's approval of a 60-day extension to the deadline for initial disclosures, to February 13, 2009, and a 60-day extension to the discovery and testimony periods as follows:

Discovery Closes	6/13/2009
Plaintiff's Pretrial Disclosures	7/28/2009
Plaintiff's 30-day Trial Period Ends	9/11/2009
Defendant's Pretrial Disclosures	9/26/2009
Defendant's 30-day Trial Period Ends	11/10/2009
Plaintiff's Rebuttal Disclosures	11/25/2009
Plaintiff's 15-day Rebuttal Pd Ends	12/25/2009

Respectfully submitted,

TREK BICYCLE CORPORATION



Date: December 15, 2008 By:

Mary Catherine Merz, Esq.  
Bruce Haraguchi, Esq.  
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Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on applicant's counsel by First Class Mail on December 15, 2008, addressed to:

H. Jay Spiegel  
H. JAY SPIEGEL & ASSOCIATES  
P.O. Box 11  
Mount Vernon, Virginia 22121

Attorney for Applicant

A handwritten signature in black ink, appearing to read "B. Haraguchi", is written over a solid horizontal line.

Bruce Haraguchi