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

Proceeding	91192102
Party	Defendant Martin G. Lagina
Correspondence Address	Robert G. Kalik, Esq. Kalik Lewin 4720 Montgomery Lane, Suite 400 Bethesda, MD 20814 UNITED STATES rkalik@kaliklewin.com.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Robert G. Kalik
Filer's e-mail	swyss@kaliklewin.com
Signature	/Robert G. Kalik/
Date	03/24/2010
Attachments	Consented Motion to Extend Time.pdf (3 pages)(39356 bytes)

In the Matter of Application Serial No. 77617766
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Pine Ridge Winery, LLC.,)	Opposition No. 91192102
)	
Opposer,)	
)	
v.)	
)	
Martin G. Lagina,)	
)	
Applicant.)	
_____)	

CONSENTED MOTION FOR EXTENSION OF TIME

Applicant, Martin G. Lagina (“Applicant”) respectfully requests on behalf of the parties that the initial disclosures deadline be extended for thirty (30) days from March 25, 2010 and further requests that the discovery and testimony periods be reset as indicated below:

- Initial Disclosures Due.....April 24, 2010**
- Expert Disclosures Due.....August 22, 2010**
- Discovery Closes.....September 21, 2010**
- Plaintiff’s Pretrial Disclosures.....November 5, 2010**
- Plaintiff’s 30-day Trial Period Ends.....December 20, 2010**
- Defendant’s Pretrial Disclosures.....January 4, 2011**
- Defendant’s 30-day Trial Period Ends.....February 18, 2011**
- Plaintiff’s Rebuttal Disclosures.....March 5, 2011**
- Plaintiff’s 15-day Rebuttal Period Ends.....April 4, 2011**

This stipulated motion for an extension of time is made in good faith and not for the purposes of delay. This extension is necessary to give the parties ample time to complete discovery and to continue settlement discussions. Counsel for Opposer, Heather Dunn, has agreed to this extension, via e-mail communications, on March 22, 2010.

Respectfully submitted,

Martin G. Lagina



Date: 3/24/2010 By: _____

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Attorney for Applicant
Martin G. Lagina

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document: CONSENTED MOTION FOR EXTENSION OF TIME was served on Opposer Pine Ridge Winer, LLC by depositing the same in the United States mail, postage prepaid, addressed to the Opposer as follows:

Heather A. Dunn, Esq.
DLA Piper LLP.
555 Mission Street, Suite 2400
San Francisco, CA 94105-2933

this 24th day of March 2010.

A handwritten signature in black ink, appearing to read "R. G. Kalik", is written over a light gray rectangular background.

Robert G. Kalik, Esq.