

ESTTA Tracking number: **ESTTA387398**

Filing date: **01/09/2011**

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

Proceeding.	91196444
Applicant	Defendant Jonathan A. Naguit
Other Party	Plaintiff Penske Systems, Inc.

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 01/21/2011. Jonathan A. Naguit requests that such date be extended for 30 days, or until 02/20/2011, and that all subsequent dates be reset accordingly.

Time to Answer :	02/20/2011
Deadline for Discovery Conference :	03/22/2011
Discovery Opens :	03/22/2011
Initial Disclosures Due :	04/21/2011
Expert Disclosure Due :	08/19/2011
Discovery Closes :	09/18/2011
Plaintiff's Pretrial Disclosures :	11/02/2011
Plaintiff's 30-day Trial Period Ends :	12/17/2011
Defendant's Pretrial Disclosures :	01/01/2012
Defendant's 30-day Trial Period Ends :	02/15/2012
Plaintiff's Rebuttal Disclosures :	03/01/2012
Plaintiff's 15-day Rebuttal Period Ends :	03/31/2012

The grounds for this request are as follows:

- *MOTION TO OPPOSE WITHDRAWAL OF COUNSEL 1. Amaury Cruz and Associates, Counsel to the applicant, just wanted to withdraw as counsel, leaving and abandoning the Applicant, JONATHAN A. NAGUIT, with no choice. 2. Counsel had not allowed time to employ a new counsel in the opposition. 3. All papers and property related to the proceedings and which Applicant may be entitled have NOT been delivered to the Applicant via E-mail or US mail. 4. All previous fee advances have NOT been earned by the law firm. Applicant was charged fees by law firm without evidence of document or proof of outcome. 5. Applicant's contact information is 389 Arden Ave, Unit #1, Glendale, California 91203. Wherefore, Applicant respectfully requests to extend the suspension of the proceeding for thirty days to allow Applicant time to secure the entitled documents.*

Jonathan A. Naguit has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Jonathan A. Naguit has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,  
/J.NAGUIT/

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01/09/2011