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

Proceeding	91197505
Party	Plaintiff Omega SA (Omega AG) (Omega Ltd.)
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Submission	Stipulated/Consent Motion to Extend
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Date	08/01/2016
Attachments	K655motion ext Pls Trial Testimony160801.pdf(64100 bytes)

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

OMEGA S.A. (OMEGA AG)
(OMEGA LTD),

Opposer,

v.

ALPHA PHI OMEGA,

Applicant.

Mark: AΦΩ

Opp. No.: 91197505 (Child)

Serial No.: 77905236

**JOINT MOTION FOR EXTENSION
OF PORTION OF PLAINTIFF'S TESTIMONY PERIOD**

The Parties respectfully move the Board for approximately a two (2) month extension of the close of Opposer's testimony period. Opposer's testimony period is currently scheduled to close on August 8, 2016, and the Parties request that this deadline be reset to October 12, 2016.

Opposer had noticed a testimonial deposition of its witness, Brice Le Troadec to take place on July 21, 2016. On July 20, 2016, less than 24 hours before commencement of the deposition, counsel for Applicant advised Opposer that because of travel complications he would be unable to attend the deposition, and that the deposition would need to be rescheduled. Specifically, counsel was scheduled to travel from Louisville, Kentucky to New York City on Southwest Airlines. However, on July 20, 2016 Southwest Airlines suffered a catastrophic computer failure and had to ground its entire fleet of aircraft, causing substantial delays and cancellations, including cancellation of Applicant's counsel's flight. Given the late cancellation of counsel's flight, he was unable to make alternative travel arrangements to allow him to attend the deposition. Opposer had to adjourn the deposition.

The Parties have met and conferred and have agreed-upon a new date to resume the trial period and to take the already-noticed deposition. This extension is needed because the Opposer is the Official Timekeeper of the Olympic Games in Rio De Janeiro, and the witness Mr. Le Troadec must attend the Olympic Games for several of the upcoming weeks. Counsel also has summer vacation travel plans which further complicated the rescheduling of this deposition. The Parties have identified the earliest possible date to reschedule the Le Troadec deposition, and this extension is necessary to accommodate the new scheduled deadline and to ensure that Opposer is not prejudiced by the delay.

This is the first extension of this deadline. For the foregoing reasons, there is good cause for granting this extension request

The Parties request that the remaining deadlines in this matter be rescheduled as follows:

Re-opening of Plaintiff's Trial Period:	September 22, 2016
Plaintiff's 30-day Trial Period Ends:	October 12, 2016
Defendants' Pretrial Disclosures:	October 27, 2016
Defendant's 30-day Trial Period Ends:	December 12, 2016
Plaintiff's Rebuttal Disclosures:	December 27, 2016
Plaintiff's 15-day Rebuttal Period Ends:	January 24, 2016

Counsel for Applicant, Jack Wheat consented to this extension via email on July 28, 2016.

Respectfully submitted
for Opposer,

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Dated: August 1, 2016

CERTIFICATE OF FILING AND SERVICE

I, Jeffrey A. Lindenbaum hereby certify that a copy of the foregoing Opposer's Consented Motion for Extension of Plaintiff's Testimony was filed electronically with the Board and served via email (by agreement) on this 1st day of August, 2016 on the undersigned counsel:

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