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

Proceeding	91199905
Party	Plaintiff Dallas Manufacturing Co., Inc.
Correspondence Address	SUSAN HWANG SHEPPARD MULLIN RICHTER & HAMPTON LLP 333 SOUTH HOPE STREET, 43rd FLOOR LOS ANGELES, CA 90071 UNITED STATES gclark@sheppardmullin.com, shwang@sheppardmullin.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Susan Hwang
Filer's e-mail	shwang@sheppardmullin.com
Signature	/Susan Hwang/
Date	02/09/2012
Attachments	159761-ConsentMotionToExtend.pdf (3 pages)(382065 bytes)

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

DALLAS MANUFACTURING CO., INC.

Opposer,

v.

IMJ MARKETING INC.

Applicant.

Opposition No. 91199905

Serial No. 85/105,221

Mark: COZY CRAFT PET BEDS

Filed: August 11, 2010

Published: January 25, 2011

CONSENT MOTION TO EXTEND DISCOVERY AND TRIAL DATES

Opposer, Dallas Manufacturing Company, Inc., through its counsel of record, hereby requests the Trademark Trial and Appeal Board to extend the remaining discovery and trial dates in the above-identified proceeding by sixty (60) days, up to and including the dates set forth in the table below.

Action	Current Deadline	Extended Deadline
Initial Disclosures Due	02/10/2012	04/10/2012
Expert Disclosures Due	06/09/2012	08/08/2012
Discovery Closes	07/09/2012	09/07/2012
Opposer's Pretrial Disclosures	08/23/2012	10/22/2012
Opposer's 30-day Trial Period Ends	10/07/2012	12/06/2012
Applicant's Pretrial Disclosures	10/22/2012	12/21/2012
Applicant's 30-day Trial Period Ends	12/06/2012	02/04/2012
Opposer's Rebuttal Disclosures	12/21/2012	02/19/2012
Opposer's 15-day Rebuttal Period Ends	01/20/2013	03/21/2012

The motion is not for purposes of delay. The parties discussed potential settlement options during the discovery conference and require additional time in order to further explore these possibilities.

In e-mail correspondence on February 8, 2012, Opposer's counsel Susan Hwang of Sheppard, Mullin, Richter & Hampton LLP, obtained the consent of Applicant's counsel, Jeffrey Dweck of The Law Firm of Jeffrey S. Dweck, P.C., to the granting of this motion.

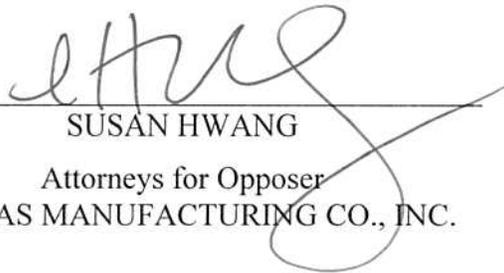
For the reasons set forth above, Applicant respectfully requests that the Board grant the requested extension.

February 9, 2012

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: _____



SUSAN HWANG

Attorneys for Opposer
DALLAS MANUFACTURING CO., INC.

333 South Hope Street, 43rd Floor
Los Angeles, California 90071
Telephone: (213) 620-1780
Facsimile: (213) 620-1398

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing CONSENT MOTION TO EXTEND DISCOVERY AND TRIAL DATES was served by first class mail, postage prepaid, on February 9, 2012 upon counsel for Applicant IMJ Marketing Inc. at the following address:

JEFFREY DWECK

THE LAW FIRM OF JEFFREY S DWECK PC

43 WEST 33RD STREET SUITE 304

NEW YORK, NY 10001-2914


BETTY I. RODRIGUEZ