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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	04/06/2012
Attachments	April 6, 2012 159761-ConsentMotionToExtend.PDF (3 pages)(150063 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 FURTHER 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	04/10/2012	06/09/2012
Expert Disclosures Due	08/08/2012	10/07/2012
Discovery Closes	09/07/2012	11/06/2012
Opposer's Pretrial Disclosures	10/22/2012	12/21/2012
Opposer's 30-day Trial Period Ends	12/06/2012	02/04/2013
Applicant's Pretrial Disclosures	12/21/2012	02/19/2013
Applicant's 30-day Trial Period Ends	02/04/2012	04/04/2013
Opposer's Rebuttal Disclosures	02/19/2012	04/19/2013
Opposer's 15-day Rebuttal Period Ends	03/21/2012	05/20/2013

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 April 5, 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.

April 6, 2012

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: _____
SUSAN HWANG
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing CONSENT MOTION TO FURTHER EXTEND DISCOVERY AND TRIAL DATES was served by first class mail, postage prepaid, on April 6, 2012 upon counsel for Applicant IMJ Marketing Inc. at the following address:

JEFFREY DWECK

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Betty I. Rodriguez

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