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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.
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Susan Hwang
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Signature	/Susan Hwang/
Date	06/28/2012
Attachments	159761-DMC and IMJ Consent Motion.PDF ( 3 pages )(141870 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.

<b>Action</b>	<b>Current Deadline</b>	<b>Extended Deadline</b>
Initial Disclosures Due	06/09/2012	08/08/2012
Expert Disclosures Due	10/07/2012	12/06/2012
Discovery Closes	11/06/2012	01/05/2013
Opposer's Pretrial Disclosures	12/21/2012	02/19/2013
Opposer's 30-day Trial Period Ends	02/04/2013	04/05/2013
Applicant's Pretrial Disclosures	02/19/2013	04/20/2013
Applicant's 30-day Trial Period Ends	04/04/2013	06/03/2013
Opposer's Rebuttal Disclosures	04/19/2013	06/18/2013
Opposer's 15-day Rebuttal Period Ends	05/20/2013	07/19/2013

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 June 27, 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.

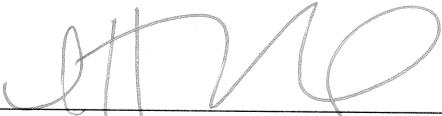
For the reasons set forth above, Applicant respectfully requests that the Board grant the requested extension.

June 28, 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 June 28, 2012 upon counsel for Applicant IMJ Marketing Inc. at the following address:

JEFFREY DWECK

THE LAW FIRM OF JEFFREY S DWECK PC

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BETTY I. RODRIGUEZ