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

Proceeding	91200085
Party	Plaintiff The Travelers Indemnity Company
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Date	10/31/2011
Attachments	CREDITUMBRELLA -- 2nd Stipulated Request For Extension of time to Respond to Show-Cause Order.pdf (4 pages)(24833 bytes)

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

<p>THE TRAVELERS INDEMNITY COMPANY,</p> <p style="text-align: center;">Opposer</p> <p style="text-align: center;">v.</p> <p>CREDIT UMBRELLA, INC.</p> <p style="text-align: center;">Applicant.</p>	<p>Consolidated Opposition No.: 91200085</p> <p></p> <p>Mark: Serial No. 85072244 Filed: June 25, 2010</p> <p></p> <p>Mark: Serial No. 85072300 Filed: June 26, 2010</p> <p></p> <p>Mark: Serial No. 85072426 Filed: June 27, 2010</p>
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**STIPULATED REQUEST FOR EXTENSION OF TIME FOR APPLICANT TO
RESPOND TO SHOW-CAUSE ORDER, AND TO RESET ALL OTHER DATES**

The parties hereby stipulate and request that the Board extend Applicant's time to respond to the Board's August 2, 2011 show-cause order by a further 60 days, and reset all other dates accordingly.

Opposer filed this opposition on June 1, 2011. Applicant's deadline to answer was July 11, 2011. Counsel for Applicant was not retained by Applicant until July 12, 2011—one day after Applicant's answer was due. On July 13, 2011, counsel for Applicant filed his appearance of counsel in this opposition.

On July 12, 2011, counsel for Applicant contacted counsel for Opposer regarding possible settlement and the parties have been actively engaged in settlement discussions since that time. On August 2, 2011, the Board issued a notice of default ordering Applicant to show cause why judgment should not be entered against Applicant. On August 11, 2011, the parties held a discovery conference and agreed to request an extension of time for Applicant to respond to the Board's August 2, 2011 show-cause order so that the parties could continue to pursue settlement.

On August 12, 2011, the parties filed a Stipulated Request for Extension of Time for Applicant to Respond to Show-Cause Order, and to Reset All Other Dates. On August 18, 2011, the Board issued an order granting the parties' stipulated extension request and allowing Applicant until October 31, 2011 to respond to the Board's show-cause order. Since that time, the parties have exchanged settlement proposals and are actively engaged in settlement negotiations. In particular, counsel for Opposer sent draft settlement terms to counsel for Applicant on September 14, 2011, and the parties have communicated through counsel regarding negotiation of such terms on at least the following dates: October 4, 2011, October 5, 2011, October 25, 2011, and October 31, 2011.

Applicant, through its counsel, consented to all of the relief requested in this stipulation.

Accordingly, the parties respectfully request that the Board extend Applicant's time to respond to the Board's August 2, 2011 show-cause order by a further 60 days, and reset all other dates accordingly.

Respectfully Submitted,

Dated: October 31, 2011

By: /Michael R. Justus/
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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing STIPULATED REQUEST FOR EXTENSION OF TIME FOR APPLICANT TO RESPOND TO SHOW-CAUSE ORDER, AND TO RESET ALL OTHER DATES was served, by first-class mail, postage prepaid on October 31, 2011 upon counsel for Applicant at the following address:

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/Larry L. White/

Larry L. White
Legal Assistant