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Filing date: **04/25/2012**

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

Proceeding	91202732
Party	Plaintiff EcoWater Systems LLC
Correspondence Address	CAROLINE STEVENS LEYDIG VOIT & MAYER LTD 1981 N BROADWAY, STE 310 WALNUT CREEK, CA 94596 UNITED STATES cstevens@leydig.com, mmiss@leydig.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Caroline L. Stevens
Filer's e-mail	cstevens@leydig.com
Signature	/Caroline L. Stevens/
Date	04/25/2012
Attachments	2012.04.25 Consented Motion for 30-Day Extension of Deadlines.pdf (3 pages) (62181 bytes)

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

In the Matter of App. Serial No. 85/094,582
Filed: July 28, 2010
Published: May 31, 2011
Mark: ECOLAB

ECOWATER SYSTEMS LLC,)	
)	
Opposer,)	
)	Opposition No.: 91202732
v.)	
)	
ECOLAB USA INC.,)	
)	
Applicant/Counterclaimant.)	
_____)	

CONSENTED MOTION FOR 30-DAY EXTENSION OF ALL DEADLINES

Opposer, EcoWater Systems, LLC, hereby moves to extend by thirty days all dates set by the Trademark Trial and Appeal Board in connection with the above-captioned opposition (the “Opposition”). Applicant, Ecolab USA Inc., has consented to this motion. During the pendency of this Opposition, the parties have been engaged in settlement discussions and the discussions are ongoing. As such, the parties agree that additional time is needed and that all deadlines should be extended by thirty days. The opposition deadlines, as extended, would be reset as follows:

Deadline for Discovery Conference	May 27, 2012
Discovery Opens	May 27, 2012
Initial Disclosures Due	June 26, 2012
Expert Disclosures Due	October 24, 2012
Discovery Closes	November 23, 2012
Plaintiff's Pretrial Disclosures	January 7, 2013
30-day testimony period for plaintiff's testimony to close	February 21, 2013

Defendant/Counterclaim Plaintiff's Pretrial Disclosures	March 7, 2013
30-day testimony period for defendant and plaintiff in the counterclaim to close	April 22, 2013
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due	May 7, 2013
30-day testimony period for defendant in the counterclaim and rebuttal testimony for plaintiff to close	June 21, 2013
Counterclaim Plaintiff's Rebuttal Disclosures Due	July 6, 2013
15-day rebuttal period for plaintiff in the counterclaim to close	August 5, 2013
Brief for plaintiff due	October 4, 2013
Brief for defendant and plaintiff in the counterclaim due	November 3, 2013
Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due	December 3, 2013
Reply brief, if any, for plaintiff in the counterclaim due	December 18, 2013

Counsel for Applicant consented to this Motion by e-mail with the undersigned on April 25, 2012. By way of clarification, the parties are not requesting a suspension of the Opposition.

Respectfully submitted,

ECOWATER SYSTEMS LLC

Date: April 25, 2012

By: Caroline Stevens
 Mark J. Liss
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Attorneys for Opposer, EcoWater Systems LLC

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that "CONSENTED MOTION FOR 30-DAY EXTENSION OF ALL DEADLINES" was filed electronically with the Trademark Trial & Appeal Board on the date indicated below, and that a copy was served on Ecolab USA Inc. on the date indicated below, via e-mail as agreed to the following:

Dean R. Karau
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dkarau@fredlaw.com

Caroline Stevens
Signature

April 25, 2012
Date