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

Proceeding	91202732
Party	Plaintiff EcoWater Systems LLC
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Caroline L. Stevens
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Date	05/21/2012
Attachments	2012.05.21 Motion to Extend Deadlines.pdf ( 3 pages )(60591 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

<b>ECOWATER SYSTEMS LLC,</b>	)	
	)	
Opposer,	)	
	)	Opposition No.: 91202732
v.	)	
	)	
<b>ECOLAB USA INC.,</b>	)	
	)	
Applicant/Counterclaimant.	)	
<hr style="width: 30%; margin-left: 0;"/>	)	

**CONSENTED MOTION FOR 30-DAY EXTENSION**

Opposer, EcoWater Systems, LLC, hereby moves to extend the deadline for initial disclosures by thirty (30) days in connection with the above-captioned opposition (the “Opposition”). On May 11, 2012, the parties held their discovery conference. The parties are engaged in settlement discussions, and the discussions are ongoing. The parties agree that additional time is needed, and that the upcoming deadline for initial disclosures should be extended by thirty (30) days, along with the other deadlines in the opposition. The opposition deadlines, as extended, would be reset as follows:

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 May 21, 2012. In conclusion, given the ongoing settlement discussions, there is good cause for extending the deadline for initial disclosures by thirty (30) days, and all other opposition deadlines. Opposer, with Applicant's consent, respectfully requests that the Board grant this Motion.

Respectfully submitted,

**ECOWATER SYSTEMS LLC**

Date: May 21, 2012

By: Caroline Stevens  
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**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:

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*Caroline Stevens*

Signature

May 21, 2012

Date