

ESTTA Tracking number: **ESTTA495848**

Filing date: **09/21/2012**

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

Proceeding	91202862
Party	Defendant LVMH Swiss Manufactures SA
Correspondence Address	KATHLEEN E MCCARTHY KING & SPALDING LLP 1185 AVENUE OF THE AMERICAS , FL 35 NEW YORK, NY 10036-2686 UNITED STATES MPerry@kslaw.com
Submission	Motion to Extend
Filer's Name	Kathleen E. McCarthy
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Signature	/Kathleen E. McCarthy/
Date	09/21/2012
Attachments	Taglink Extension 9 21 2012.pdf (3 pages)(23120 bytes)

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

Technology Advancement Group, Inc.)	
)	
Opposer)	
)	
v.)	Opposition No. 91202862
)	Appln. No. 85282081
LMVH Swiss Manufactures, SA)	Mark: TAGLINK
)	
Applicant)	

APPLICANT'S MOTION TO EXTEND DISCOVERY AND TESTIMONY PERIODS

Applicant, LMVH Swiss Manufactures, SA. hereby moves the Board for an extension of time for a period of sixty (60) days (a) to respond to Opposer's discovery requests from September 21, 2012 through and including November 20, 2012, and (b) for all other remaining deadlines in this action. Under the requested extension, the new deadlines would be as follows:

Applicant's responses to discovery	11/20/2012
Discovery Closes	12/12/2012
Plaintiff's Pretrial Disclosures:	01/27/2013
Plaintiff's 30-day Trial Period Ends:	03/11/2013
Defendant's Pretrial Disclosures:	03/26/2013
Defendant's 30-day Trial Period Ends:	05/09/2013
Plaintiff's Rebuttal Disclosures:	05/24/2013
Plaintiff's 15-day Rebuttal Period Ends:	06/26/2013

Applicant submits that good cause for the requested extension is shown by the

following:

- Applicant is located outside of the United States, making communications between Applicant's counsel and Applicant more difficult;
- Up until recently, the parties have been engaged in settlement discussions in an effort to resolve this matter; and
- Applicant today proposed to Opposer an amendment to the description of goods in the opposed application in a further effort to resolve this dispute.

Counsel for Opposer was contacted for consent to requested extension but has not responded as of the deadline for the filing.

WHEREFORE, the Applicant respectfully request the Board grant the extension of time set forth above.

Dated: September 21, 2012

By: Kathleen E. McCarthy
Kathleen E. McCarthy, Esq.
KING & SPALDING
1185 Avenue of the Americas
New York, NY 10036
Attorneys for Applicant

CERTIFICATE OF SERVICE

This is to certify, in accordance with Rule 2.101(b) of the Trademark Rules of Practice, that I have this day served the foregoing LVMH SWISS MANUFACTURES, SA'S APPLICANT'S MOTION TO EXTEND DISCOVERY AND TESTIMONY PERIODS on the Opposer, by causing a true and correct copy thereof to be emailed, addressed to the attorneys of record for the Opposer as follows:

Scott J. Major
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September 21, 2012

/Kathleen E. McCarthy/
Kathleen E. McCarthy