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

Proceeding	91204095
Party	Defendant The Safe Cig, LLC
Correspondence Address	PHILIP J DAMAN DAMAN LLC 17383 SUNSET BLVD SUITE A340 PACIFIC PALISADES, CA 90272 UNITED STATES michael.lovitz@damanllc.com, phillip.daman@damanllc.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Michael L. Lovitz
Filer's e-mail	trademarks@damanllc.com
Signature	/michael l lovitz/
Date	04/07/2014
Attachments	Motion for extension of dates.pdf(64467 bytes )

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Lorillard Licensing Company, LLC	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No. 91204095
	:	
The Safe Cig, LLC	:	
	:	Attorney Docket No. D1003-9001
Applicant.	:	

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**MOTION TO EXTEND DISCOVERY AND TRIAL DATES ON CONSENT**

Applicant, The Safe Cig, LLC (“Applicant”), through undersigned counsel, requests the close of the discovery and trial periods be extended by six (6) months in order to permit the parties to complete discovery in the above-captioned matter. Opposer has consented to this extension request.

In accordance with the Board’s September 25, 2013 Order, granting the September 6, 2013 motion for extension of dates, Applicant submits that good cause exists for this extension request and provides the following information regarding the progress of ongoing settlement negotiations.

During early 2013 Applicant experience internal disorder and disputes arose the majority owners and minority owners of Applicant, which disorder has led to the filing of lawsuits among numerous parties. Among the results arising from these legal actions has been the freezing of operational funds and the appointment of a receiver to control the operations of Applicant. On August 30, 2013, a permanent receiver was appointed. As a result, it has not been possible for Applicant to fully and properly engage in meaningful discussions regarding the specifics of settlement terms. Additionally, it will be difficult for Applicant to meet its discovery obligations until the receivership has been concluded.

It is anticipated that the receivership will be terminated during the next few months, although the precise date is not yet know. Therefore, the parties are requesting an extension of the discovery and trial dates to permit time for Applicant to leave receivership, and permit the parties to return to their settlement discussions.

In light of the foregoing, the parties respectfully request that the Board reset the discovery and trial dates as follows:



**CERTIFICATE OF SERVICE**

I, Michael L. Lovitz, hereby certify on this 10th day of December, 2012, that a true and correct copy of the foregoing **Initial Disclosures of Applicant The Safe Cig, LLC** was served upon counsel of record, per agreement between the parties, by electronic mail at the following address:

James L. Lester, Esq.  
jlester@maccordmason.com

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Michael L. Lovitz, Esq.