

ESTTA Tracking number: **ESTTA552697**

Filing date: **08/07/2013**

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

Proceeding.	91204150
Applicant	Defendant Campus Crusade for Christ, Inc. aka Campus Crusade for Christ International, Campus Crusade for Christ, Campus Crusade, CCCI
Other Party	Plaintiff The University of Mary Hardin-Baylor
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 08/07/2013. Campus Crusade for Christ, Inc. aka Campus Crusade for Christ International, Campus Crusade for Christ, Campus Crusade, CCCI requests that such date be extended for 30 days, or until 09/06/2013, and that all subsequent dates be reset accordingly.

Time to Answer :	09/06/2013
Deadline for Discovery Conference :	10/06/2013
Discovery Opens :	10/06/2013
Initial Disclosures Due :	11/05/2013
Expert Disclosure Due :	03/05/2014
Discovery Closes :	04/04/2014
Plaintiff's Pretrial Disclosures :	05/19/2014
Plaintiff's 30-day Trial Period Ends :	07/03/2014
Defendant's Pretrial Disclosures :	07/18/2014
Defendant's 30-day Trial Period Ends :	09/01/2014
Plaintiff's Rebuttal Disclosures :	09/16/2014
Plaintiff's 15-day Rebuttal Period Ends :	10/16/2014

The grounds for this request are as follows:

- *The parties have undertaken continuous and extensive dialogue, negotiation and exchange of information in seeking to reach a Co-Existence and Settlement Agreement pertaining to over twelve classes of goods and services. The parties have not initiated formal discovery, however, the parties have exchanged significant amounts of information, in the context of settlement negotiations, pertaining to the historical uses and proposed future uses of the marks in question. The parties have used this information to resolve a significant number of issues pertaining to a Co-Existence and Settlement Agreement. They have exchanged more than a dozen drafts of a proposed Co-Existence and Settlement Agreement, which is intended to cover, among many other topics, the parties' rights to use and register a number of marks for an array of goods and services in multiple classes. Timeframe: The parties have reached substantive agreement on the major issues and are working through final negotiation of the co-existence agreement which the parties are seeking to conclude in the following thirty (30) days.*

Campus Crusade for Christ, Inc. aka Campus Crusade for Christ International, Campus Crusade for Christ, Campus Crusade, CCCI has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Campus Crusade for Christ, Inc. aka Campus Crusade for Christ International, Campus Crusade for Christ, Campus Crusade, CCCI has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/Patricia M. Beeber/

Patricia M. Beeber

gco.ip@cru.org, laura.sherwood@cru.org

svale@pirkeybarber.com, afrey@pirkeybarber.com, eolson@pirkeybarber.com, vpowell@pirkeybarber.com

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