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

Proceeding	91204723
Party	Defendant Revolution Dancewear, LLC
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Date	09/20/2012
Attachments	Stipulated Motion to Extend.pdf (5 pages)(28214 bytes)

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

RIVER LIGHT V, L.P.

Opposer,

Opposition No. 91204723

v.

REVOLUTION DANCEWEAR, LLC

Applicant.
_____ /

Trademark Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1451
Alexandria, VA 22313-1451

STIPULATED MOTION TO EXTEND TIME TO ANSWER (With Cause)

Applicant Revolution Dancewear, LLC, with the consent and stipulation of Opposer River Light V, L.P., respectfully requests that the Trademark Trial and Appeal Board extend Applicant's time to file an Answer or otherwise plead by sixty (60) days, as set forth below:

Time to Answer: 11/19/2012

Deadline for Discovery Conference: 12/19/2012

Discovery Opens: 12/19/2012

Initial Disclosures Due: 1/18/2013

Expert Disclosures Due: 5/18/2013

Discovery Closes: 6/17/2013

Plaintiff's Pretrial Disclosures: 8/1/2013

Plaintiff's 30-day trial period ends: 9/15/2013

Defendant's Pretrial Disclosures: 9/30/2013

Defendant's 30-day trial period ends: 11/14/2013

Plaintiff's Rebuttal Disclosures: 11/29/2013

Plaintiff's 15-day Rebuttal Period Ends: 12/29/2013

This extension request is not for the purposes of delay, but is in light of settlement discussions between the parties. As set forth in the TTAB's Order granting the parties' previous motion to extend, Applicant offers the following detailed report to support the parties' request for another extension:

- 1) Issues that have been resolved: The parties have reached an agreement in principal, whereby Applicant will amend its application and agree to certain other confidential terms pertaining to use of its mark. In exchange, Opposer will agree to withdraw the opposition.
- 2) Issues that remain to be resolved: The parties believe that all issues have been resolved, at least in principal, with one exception pertaining to distribution channels. The parties believe that they are close to settling on acceptable language with respect to that remaining issue. Beyond that, only the specific terms of an agreement remain open.
- 3) Firm timetable for resolution: The parties expect to incorporate the principal terms into a draft settlement agreement within the next 7-10 days. The parties will then negotiate any specific issues, with the goal of reaching a final settlement within the next 30 days. Nevertheless, the parties are requesting a sixty (60) day extension to avoid the need for any further extensions in this matter. In light of the negotiations to

date, there is a high likelihood that the case will be settled well within the extended time frame.

Opposing counsel has consented to this extension in an e-mail communication.

HONIGMAN MILLER SCHWARTZ AND COHN LLP
Attorneys for Applicant, Revolution Dancewear LLC

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Dated: September 20, 2012

CERTIFICATE OF TRANSMITTAL

I hereby certify that on September, 2012, this correspondence was electronically transmitted in PDF format to the Trademark Trial and Appeal Board through Electronic System for Trademark Trials and Appeals (ESTTA).

/Rebecca Olivier/

Rebecca Olivier

CERTIFICATE OF SERVICE

I hereby certify that on this date this correspondence is being served on counsel for applicant via email as agreed upon between counsel.

Date: September 20, 2012

/Rebecca Olivier/

Rebecca Olivier