

ESTTA Tracking number: **ESTTA548725**

Filing date: **07/16/2013**

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

Proceeding	91209206
Party	Plaintiff Spiraledge, Inc.
Correspondence Address	KATHLEEN A SKINNER BEESON SKINNER BEVERLY LLP ONE KAISER PLAZA , SUITE 750 OAKLAND, CA 94612 UNITED STATES bsb@bsbllp.com,kskinner@bsbllp.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kathleen A. Skinner
Filer's e-mail	kskinner@bsbllp.com,bsb@bsbllp.com,robert.verkonyi@smithhopen.com,trade marks@smithhopen.com
Signature	/Kathleen A. Skinner/
Date	07/16/2013
Attachments	2013-07-16-Request for Extension of Dates.pdf(13831 bytes )

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

Atty Docket: K3041-201.OP2	)	
	)	
Spiraledge, Inc.	)	OPPOSITION NO. 91209206
	)	
Opposer,	)	Appln. Serial No. 85/616,734
	)	
v.	)	MARK: AQUATICA
	)	
Premium Sales Network, LLC	)	
	)	
Applicant.	)	
	)	

**MOTION FOR AN EXTENSION OF INITIAL DISCLOSURES AND TRIAL PERIODS  
WITH CONSENT**

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2). The next action currently due is the service of Initial Disclosures on July 16, 2013. Spiraledge, Inc. requests that such date be extended for 30 days, or until August 15, 2013, and that all subsequent dates be reset accordingly.

<b>Time to Answer :</b>	CLOSED
<b>Deadline for Discovery Conference :</b>	CLOSED
<b>Discovery Opens :</b>	CLOSED
<b>Initial Disclosures Due :</b>	08/15/2013
<b>Expert Disclosures Due :</b>	12/13/2013
<b>Discovery Period to Close :</b>	01/12/2014
<b>Plaintiff Pretrial Disclosures :</b>	02/26/2014
<b>Plaintiff's 30-day Trial Period Ends :</b>	04/12/2014
<b>Defendant's Pretrial Disclosures :</b>	04/27/2014
<b>Defendant's 30-day Trial Period ends :</b>	06/11/2014
<b>Plaintiff's Rebuttal Disclosures :</b>	06/26/2014
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	07/26/2014

The grounds for this request are as follows:

- The parties are considering a possible amicable resolution of the matter.

Spiraledge, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein by email communications of July 16, 2013 with applicant's attorney, Robert Varkonyi of Smith & Hopen, P.A.

Spiraledge, Inc. 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.

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by First Class Mail on this date.

Respectfully submitted,

SPIRALEDGE, INC.

Dated: July 16, 2013

By /Kathleen A. Skinner/  
Kathleen A. Skinner  
Beeson Skinner Beverly LLP  
Attorney for Opposer  
One Kaiser Plaza, Suite 750  
Oakland, California 94612  
Telephone (510) 832-8700  
Fax: (510) 836-2595  
Email: [bsb@bsbllp.com](mailto:bsb@bsbllp.com); [kskinner@bsbllp.com](mailto:kskinner@bsbllp.com)

Email of applicant's attorney: [robert.varkonyi@smithhopen.com](mailto:robert.varkonyi@smithhopen.com); [trademarks@smithhopen.com](mailto:trademarks@smithhopen.com)

## CERTIFICATE OF MAILING

I hereby certify that a copy of this Motion for Extension of Initial Disclosures and Trial Periods was served on counsel for Applicant on the date below by mailing the same via first class mail, postage prepaid, to:

Robert Varkonyi  
Smith & Hopen, P.A.  
180 Pine Ave. N.  
Oldsmar, Florida 34677-4629

and by emailing the same to:

[robert.verkonyi@smithhopen.com](mailto:robert.verkonyi@smithhopen.com); [trademarks@smithhopen.com](mailto:trademarks@smithhopen.com)

DATED: July 16, 2013

/Kathleen A. Skinner/  
Kathleen A. Skinner