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

Proceeding	91209747
Party	Plaintiff Rita M. Clark d/b/a Bluewater Rentals
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Submission	Motion to Extend
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Date	06/04/2014
Attachments	Bluewater - Motion to Extend Time to Respond to MSJ.pdf(92777 bytes)

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

In the Matter of Application Serial No. 85644802
Published in the Official Gazette on November 13, 2012
Mark: Bluewater Key
International Class: 43

CLARK, RITA M. d/b/a
BLUEWATER RENTALS

Opposer,

Opposition No. 91209747

v.

BLUEWATER KEY RV OWNERSHIP
PARK PROPERTY OWNERS
ASSOCIATION, INC.,

Applicant

BLUEWATER KEY RV OWNERSHIP
PARK PROPERTY OWNERS
ASSOCIATION, INC.,

Petitioner,

Cancellation No. _____

v.

CLARK, RITA M. d/b/a
BLUEWATER RENTALS

Respondent.

**MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO RESPONDENT'S MOTION FOR SUMMARY JUDGMENT**

Petitioner, Rita M. Clark d/b/a Bluewater Rentals, through undersigned counsel files this Motion for an Extension of Time to Respond to Respondent's Motion for Summary Judgment, and in support thereof states the following:

1. On April 29, 2014, Respondent, Bluewater Key RV Ownership Park Property Owner's Association, Inc., filed a Motion for Summary Judgment (the "MSJ") in this proceeding.

2. Petitioner's response to the MSJ was originally due on May 29, 2014.

3. Petitioner contacted Respondent and requested a thirty (30) day extension of time to respond to the MSJ.

4. On May 19, 2014, Respondent agreed to extend the Petitioner's response deadline until June 6, 2014, a mere eight (8) day extension.

5. Due to intervening deadlines, professional commitments, and prepaid travel plans, Petitioner requires an additional thirty (30) days to respond to the pending MSJ, up to and including July 11, 2014.

6. Further, the parties are engaged in ongoing settlement discussions, which may moot the pending MSJ and resolve these proceedings.

7. Extending Petitioner's deadline will not prejudice the parties or interfere with the Board's calendar, as all other deadlines in this proceeding have been suspended pending the disposition of the MSJ.

8. Prior to filing this Motion, undersigned contacted counsel for Respondents to determine whether the instant Motion would be opposed. As of filing this Motion, Respondent has not yet indicated whether it would consent to the extension sought. Petitioners are therefore filing the Motion in an abundance of caution.

WHEREFORE, Petitioner requests that the period of time for Petitioner to respond to Respondent's Motion for Summary Judgment be extended until July 11, 2014.

Dated: June 4, 2014

Respectfully submitted,

BECKER & POLIAKOFF, P.A.



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CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2014, a true and correct copy of the foregoing Motion to Extend Discovery Period with Consent was served by email and First Class mail to the address listed below.

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