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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	Other Motions/Papers
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Date	09/06/2013
Attachments	Bluewater Rentals - Motion for Extension of Time to Serve Responses to Discovery Requests.pdf(16211 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.

**OPPOSER'S MOTION FOR EXTENSION
OF TIME TO SERVE DISCOVERY RESPONSES**

Opposer, Rita M. Clark d/b/a Bluewater Rentals, by and through her undersigned counsel, and pursuant to 37 CFR § 2.120(a)(3), files this Motion for Extension of Time to Serve Discovery Responses and states as follows:

1. Applicant, Bluewater Key RV Ownership Park Property Owners Association, Inc., served its Requests for Admissions¹ upon Opposer on August 8, 2013. Applicant later served its Requests for Production of Documents and Interrogatories upon Opposer on August 12, 2013. These discovery requests are extensive in size and scope, comprised of 101 requests for admissions, 25 interrogatories, and 79 requests for the production of documents.

¹ The document is titled "Applicant's First Set of Requests for the Production of Documents to Opposer." However the cover letter attached to the document refers to it as "Requests for Admissions," and the text of the document itself sets forth 101 requests for admissions.

2. Due to intervening deadlines, other professional commitments, previously scheduled out of state travel plans, Labor Day weekend, the Jewish Holidays (Rosh Hashanah and Yom Kippur), and the size and scope of the discovery requests, undersigned counsel requires an extension, up to and including September 27, 2013, to serve responses to Applicant's outstanding discovery requests.²

3. Prior to filing this motion, undersigned Counsel requested an enlargement of time from office of Counsel for Applicant, but has not received a response as of this filing.

WHEREFORE, Opposer, Rita M. Clark d/b/a Bluewater Rentals, respectfully requests that this Court grant this motion, together with such other relief as the Court deems just and proper.

Dated: September 6, 2013

Respectfully submitted,

/s/ Kevin Markow
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² Responses to the Requests for Admissions are due on September 9, 2013 and responses to the Requests for Production of Documents and Interrogatories are due on September 11, 2013. Opposer is requesting that all responses for outstanding discovery be due on the same day.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6, 2013, the undersigned electronically filed this document with the Trademark Trial and Appeal Board, and has caused a true and correct copy of this Notice of Opposition to be served via email and first class mail, postage prepaid, to:

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/s/ Kevin Markow _____
KEVIN MARKOW, ESQ.

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