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

Proceeding	91210265
Party	Defendant Yonetani Takushi
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Submission	Stipulated/Consent Motion to Extend
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Date	09/28/2015
Attachments	POPL-O1198-M. to Enlarge Dates 092815.pdf(246761 bytes)

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

Allstate Insurance Company,)	
)	
Opposer,)	Opposition no. 91210265
)	
v.)	Serial no. 79/118,763
)	
Takushi Yonetani,)	Mark: ALLSTATE
)	
Applicant.)	
_____)	

STIPULATED MOTION TO EXTEND DISCOVERY DATES

Takushi Yonetani (“Yonetani”) requests that the remaining deadlines in this case be extended by ninety (90) days, so the remaining schedule is:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	01/12/2016
Discovery Closes :	02/11/2016
Plaintiff's Pretrial Disclosures :	03/27/2016
Plaintiff's 30-day Trial Period Ends :	05/11/2016
Defendant's Pretrial Disclosures :	05/26/2016
Defendant's 30-day Trial Period Ends :	07/10/2016
Plaintiff's Rebuttal Disclosures :	07/25/2016
Plaintiff's 15-day Rebuttal Period Ends :	08/24/2016

The grounds for this request are that the parties continue to be engaged in settlement negotiations. The progress of discovery and settlement negotiations is:

- 1) Allstate Insurance Company (“AIC”) has served its first round of discovery requests on Yonetani.
- 2) The parties continue to discuss points of settlement, and have had regular communications concerning settlement.
- 3) A draft settlement agreement has been prepared and circulated among the parties, and the parties believe they will be able to resolve their dispute through continued discussions.

4) Several points of settlement appear acceptable to both parties, subject to resolution of other points still being discussed between them.

4) The parties believe that settlement negotiations can be completed within the duration of the requested extension.

Yonetani has secured the express consent of the Opposer, AIC, for the requested extension and resetting of dates.

Takushi Yonetani

/stevenjsolomon/

By: _____

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September 28, 2015

CERTIFICATE OF SERVICE

I certify that this document is being served on September 28, 2015 upon counsel of record for the Opposer, Marsha K. Hoover and Richard M. LaBarge, via email at the following email addresses by agreement of the parties:

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Steven J. Solomon
Attorney for Applicant