

ESTTA Tracking number: **ESTTA560561**

Filing date: **09/20/2013**

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

Proceeding	91212043
Party	Defendant DeRamus, Jimmie
Correspondence Address	CHRISTOPHE SZAPARY PROVOSTY & GANKENDORFF 650 POYDRAS ST STE 2700 NEW ORLEANS, LA 70130-6180 cszapary@provostylaw.com;kbroom@provost
Submission	Motion to Extend
Filer's Name	Christophe Szapary
Filer's e-mail	cszapary@provostylaw.com
Signature	/Christophe Szapary/
Date	09/20/2013
Attachments	Signed Request for Extension.PDF(37380 bytes)

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

HERSCHEND FAMILY ENTERTAINMENT CORPORATION

Opposer

Opposition No.: 91212043

Serial No. 85626880

V.

DERAMUS, JIMMIE

Applicant

**Commissioner of Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451
Attention: Trademark Trial and Appeal Board**

MOTION FOR THIRTY (30) DAY EXTENSION OF TIME TO ANSWER

The applicant, Jimmie DeRamus (hereinafter referred to as “Applicant”), currently has to file an answer on or before September 23, 2013, and the close of discovery is currently set for April 21, 2014. Applicant hereby requests that his time to answer be extended by thirty (30) days from the current due date, or until October 23, 2013. The grounds for Applicant’s request are as follows:

- Applicant needs additional time to investigate and evaluate the claims and develop a response to same; and
- Applicant needs additional time to develop a course of action, including but not limited to consideration of potential settlement negotiations and commencement of same with the Opposer.

Based upon the requested thirty (30) day extension of time to file an Answer, Applicant proposes the following revised scheduling deadlines:

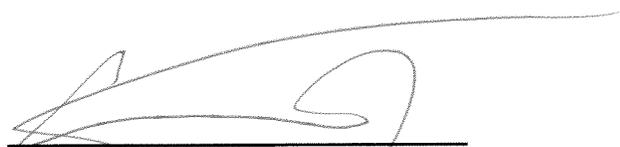
- Time to Answer 10/23/2013
- Deadline for Discovery Conference 11/22/2013
- Discovery Opens 11/22/2013
- Initial Disclosures Due 12/22/2013
- Expert Disclosures Due 4/21/2014
- Discovery Closes 5/21/2014
- Plaintiff's Pretrial Disclosures 7/5/2014
- Plaintiff's 30-day Trial Period Ends 8/19/2014
- Defendant's Pretrial Disclosures 9/3/2014
- Defendant's 30-day Trial Period Ends 10/18/2014
- Plaintiff's Rebuttal Disclosures 11/2/2014
- Plaintiff's 15-day Rebuttal Period Ends 12/2/2014

WHEREFORE, Applicant respectfully requests that his Motion for Thirty (30) Day Extension of Time to File an Answer be Granted in accordance with the foregoing.

Date: September 20, 2013

Respectfully submitted,

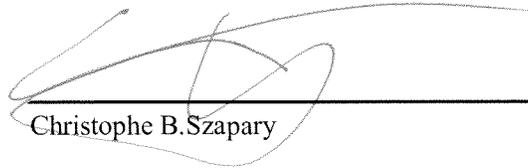
By:



PROVOSTY & GANKENDORFF, L.L.C.
CHRISTOPHE SZAPARY (Bar No. 25890)
KEELIE M. BROOM (Bar No. 33032)
cszapary@provostylaw.com
kbroom@provostylaw.com
650 Poydras Street, Suite 2700,
New Orleans, Louisiana 70130
Telephone: 504-410-2795
Facsimile: 504-410-2796
Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I have, this 20th day of Setpember, 2013, served one copy of the foregoing motion for an extension of time to answer upon counsel for the Opposer, Herschend Family Entertainment Corporation, by U.S. certified mail (properly addressed to 1230 Peachtree St. NE Suite 3100, Atlanta GA 30309 and postage prepaid) and faxing and emailing same to counsel for the Opposer at caholland@sgrlaw.com.



Christophe B. Szapary