

ESTTA Tracking number: **ESTTA577367**

Filing date: **12/18/2013**

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

Proceeding	91212357
Party	Defendant Fabbrica D'Armi Pietro Beretta S.p.A.
Correspondence Address	REBECCA L GAN YOUNG & THOMPSON 209 MADISON STREET, SUITE 500 ALEXANDRIA, VA 22314 UNITED STATES trademarks@young-thompson.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Rebecca Gan, Esquire
Filer's e-mail	trademarks@young-thompson.com
Signature	/rgan/
Date	12/18/2013
Attachments	2013-12-18 Request for Extension of Deadlines 2564-1269-1 (2).pdf(21050 bytes )

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

In the matter of Application Serial No. 79/099,280  
Mark: STORM

Alliant Techsystems Inc.

Opposer-Plaintiff

v.

Fabbrica D'Armi Pietro Beretta S.p.A.

Applicant-Defendant

Opposition No. 91212357

**CONSENTED MOTION FOR 60-DAY EXTENSION OF TIME TO ANSWER**

Pursuant to TBMP Section 509, and with the consent of Opposer-Plaintiff's counsel, comes now counsel for Applicant-Defendant to request a 60-day extension of the deadline for the Time to Answer. Despite best efforts, Counsel for the overseas Applicant-Defendant was unable to secure timely instructions from the Applicant, the Italian parent company and rights holder, its U.S. subsidiary, or obtain consent from Opposer-Plaintiff in advance of the Answer deadline. Moreover, given that the Motion has been filed within two (2) days of the original deadline and with the consent of the Opposer-Plaintiff, no prejudice can be evidenced. The parties shall endeavor to bring this proceeding to a close without the need for additional extensions.

The upcoming deadlines should thus be reset as follows:

Time to Answer:	2/13/2014
Deadline for Discovery Conference:	3/15/2014
Discovery Opens:	3/15/2014
Initial Disclosures Due:	4/14/2014

Expert Disclosures Due:	8/12/2014
Discovery Closes:	9/11/2014
Plaintiff's Pretrial Disclosures:	10/26/2014
Plaintiff's 30-day Trial Period Ends:	12/10/2014
Defendant's Pretrial Disclosures:	12/25/2014
Defendant's 30-day Trial Period Ends:	2/8/2015
Plaintiff's Rebuttal Disclosures:	2/23/2015
Plaintiff's 15-day Rebuttal Period Ends:	3/25/2015

WHEREFORE, Applicant-Defendant respectfully requests that the Time to Answer and subsequent deadlines be reset as set out above.

Respectfully submitted,

/rgan/

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Rebecca Gan, Esquire  
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Tel: 703-521-0143  
rgan@young-thompson.com  
Date: December 18, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December 2013, a true and correct copy of the foregoing CONSENTED MOTION FOR 60-DAY EXTENSION OF TIME TO ANSWER is being emailed, with consent, to Stephen R. Baird, Esq. (sbaird@winthrop.com), counsel for Opposer-Plaintiff.

/jc/  
Jennifer Coles

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