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

Proceeding	91212917
Party	Defendant LB Brands, LLC
Correspondence Address	EDWARD J SACKMAN BERNSTEIN SHUR PA 670 N COMMERCIAL ST STE 108, PO BOX 1120 MANCHESTER, ME 04101-4166 UNITED STATES jkeenan@bssn.com
Submission	Motion to Extend
Filer's Name	Edward J. Sackman
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Signature	/s/ Edward J. Sackman
Date	02/10/2014
Attachments	Mtn to extend time to answer discovery.pdf(23943 bytes)

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

PRIMAL WEAR, INC.)	
)	
)	
Opposer,)	
)	
v.)	Opposition No. 91212917
)	
)	Serial No. 85/689,425
LB BRANDS, LLC,)	
)	
)	Opposed Mark: IT STIRS YOUR PRIMAL SENSES
Applicant.)	
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**APPLICANT’S MOTION TO EXTEND TIME TO RESPOND TO
OPPOSER’S WRITTEN DISCOVERY**

NOW COMES LB Brands, LLC (“LBB”), by and through counsel, and moves to extend the time to respond to Opposer Primal Wear, Inc.’s written discovery to March 7, 2014 for the reasons that follow.

1. On or about January 7, 2014, Opposer Primal Wear, Inc. (“Primal Wear”) served requests for admission, interrogatories, and requests for production on LBB. Accordingly, the responses thereto would have been due on or about February 6, 2014.

2. During January 2014, LBB and Primal Wear engaged in discussions concerning the potential resolution of the above-captioned matter. In the course of those discussions, the parties exchanged written proposals.

3. In view of the possibility that resolution may be close at hand, LBB requested that Primal Wear grant it an extension of 30 days to respond to Primal Wear’s written discovery so that LBB would not have to incur the costs of preparing responses. Primal Wear refused that request. It further refused to assent to this motion.

4. LBB remains in discussions to resolve this matter with Primal Wear, and is presently seeking to formalize its response to Primal Wear's latest offer. It now files this motion so that it may continue its discussions and, potentially, resolve this matter without incurring the costs of responding to written discovery.

5. LBB has not filed a brief with this motion because it has incorporated the grounds for the relief it seeks herein.

PRAYER FOR RELIEF

WHEREFORE, LBB requests that the Board:

- A. Permit LBB until March 7, 2014 to respond to Primal Wear's written discovery; and
- B. Grant such other relief as may be just and proper.

Respectfully submitted,
LB Brands, LLC
By its attorneys,
Bernstein Shur, P.A.

Dated: February 10, 2014

/s/ Edward J. Sackman
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CERTIFICATE OF SERVICE

I hereby certify that I provided a true and exact copy of the foregoing via first class U.S. mail, postage prepaid, this 10th day of February, 2014 to:

Tamara S. Pester, Esq.
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/s/ Edward J. Sackman _____
Edward J. Sackman, Esq.