

ESTTA Tracking number: **ESTTA658506**

Filing date: **02/27/2015**

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

Proceeding	91213081
Party	Plaintiff The Trustees of the Bonnie Cashin Foundation Lucia Keller and David Baum
Correspondence Address	L DONALD PRUTZMAN TANNEBAUM HELPERN SYRACUSE & HIRSCHTRITT LLP 900 THIRD AVENUE NEW YORK, NY 10022 UNITED STATES prutzman@thsh.com, skickham@coach.com
Submission	Motion to Extend
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Signature	/sbkickham/
Date	02/27/2015
Attachments	Motion to Extend Discovery for 60 days w. Consent (fully executed).pdf(75263 bytes)

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

In the matter of trademark application Serial No. 85/252339
Filed January 25, 2012
For the mark BONNIE CASHIN
Published in the Official Gazette on June 25, 2012

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THE TRUSTEES OF THE BONNIE CASHIN :
FOUNDATION, LUCIA KELLAR AND DAVID :
BAUM, a New York Trust, : Opposition No. 91213081
 : (parent)
Opposer, :
 :
 :
-against- :
 :
STEPHANIE DAY LAKE, an individual, :
 :
Applicant. :
----- x
----- x
COACH, INC., :
Opposer, : Opposition No. 91213082
 :
 :
-against- :
 :
STEPHANIE DAY LAKE, an individual, :
 :
Applicant. :
----- x

Motion for a Sixty (60) Day Extension of Time with Consent

Pursuant to the Board's January 9, 2015 Order, Opposers were allowed until February 1, 2015 to respond to Applicant's outstanding discovery requests. On January 29, 2015 Opposers filed a Motion for a Thirty (30) Day Extension of Time with Consent that has not yet been granted by the Board. Opposers take this opportunity to note that the January 29, 2015 Motion is currently listed in TTABVue as a Motion *without* Consent, when in fact, the Motion is *with* Consent. Now the Opposers hereby move the Board for an Order granting an additional sixty (60) day extension of time on all discovery and trial dates. The parties have held their discovery

conferences as required under Trademark Rules 2.120(a)(1) and (a)(2). Should the Board grant the January 29, 2015 Motion and the instant Motion, the new dates are set forth below:

Time to Answer : CLOSED

Deadline for Discovery Conference : CLOSED

Discovery Opens : CLOSED

Initial Disclosures Due : CLOSED

Deadline for Opposers to Respond to Applicant's Discovery Requests: 05/04/2015

Expert Disclosure Due : 05/25/2015

Discovery Closes : 06/23/2015

Plaintiff's Pretrial Disclosures : 08/07/2015

Plaintiff's 30-day Trial Period Ends : 09/21/2015

Defendant's Pretrial Disclosures : 10/06/2015

Defendant's 30-day Trial Period Ends : 09/21/2015

Plaintiff's Rebuttal Disclosures : 12/07/2015

Plaintiff's 15-day Rebuttal Period Ends : 01/04/2016

Opposers have secured the express consent of Applicant for the extension and resetting of dates requested herein.

Opposers have provided an email address herewith for themselves and for Applicant so that any order on this motion may be issued electronically by the Board.

TANNENBAUM HELPERN SYRACUSE
& HIRSCHTRITT

By: /L. Donald Prutzman/

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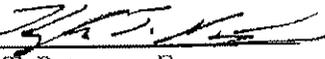
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and 91213082*

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2015, I caused a true and correct copy of the foregoing MOTION FOR A SIXTY (60) DAY EXTENSION OF TIME WITH CONSENT to be served by electronic mail on the attorney and correspondent of record for and the Applicant as follows:

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/sbkickham/
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