

ESTTA Tracking number: **ESTTA669824**

Filing date: **04/30/2015**

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
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Submission	Motion to Extend
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Signature	/sbkickham/
Date	04/30/2015
Attachments	Motion to Suspend Opposition for 60 days w. Consent (April 2015).pdf(203016 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
Opposer,	:	(parent)
	:	
-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 was retroactively granted by the Board on March 3, 2015. On February 27, 2015 Opposers filed a Motion for a Sixty (60) Day Extension of Time with Consent that was granted by the Board on March 3, 2015. Opposers take this opportunity to note that the February 27, 2015 Motion contained a typographical error. The deadline for Defendant's 30-day Trial Period was erroneously listed as

September 21, 2015 when in fact that date should have been listed as November 20, 2015. 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 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: 07/03/2015**

**Expert Disclosure Due : 07/24/2015**

**Discovery Closes : 08/22/2015**

**Plaintiff's Pretrial Disclosures : 10/06/2015**

**Plaintiff's 30-day Trial Period Ends : 11/20/2015**

**Defendant's Pretrial Disclosures : 12/05/2015**

**Defendant's 30-day Trial Period Ends : 01/19/2016**

**Plaintiff's Rebuttal Disclosures : 02/05/2016**

**Plaintiff's 15-day Rebuttal Period Ends : 03/04/2016**

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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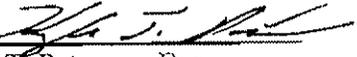
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and 91213082*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 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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Sarah B. Ku