

ESTTA Tracking number: **ESTTA681352**

Filing date: **07/01/2015**

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	Stipulated/Consent Motion to Extend
Filer's Name	Sarah B. Kickham
Filer's e-mail	Prutzman@thsh.com, peterson@ptslaw.com
Signature	/sbkickham/
Date	07/01/2015
Attachments	Motion to Extend Discovery for 60 days w. consent (July) (fully executed).pdf(84228 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
----- 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. On April 30, 2015 Opposers filed a Motion for a Sixty (60) Day Extension of Time with Consent that was granted by the Board on May 4, 2015. Also on May 4, 2015, the parties met again to discuss the settlement proposals which are still under business review. 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: 09/01/2015

Expert Disclosure Due : 09/22/2015

Discovery Closes : 10/21/2015

Plaintiff's Pretrial Disclosures : 12/05/2015

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

Defendant's Pretrial Disclosures : 02/03/2016

Defendant's 30-day Trial Period Ends : 03/19/2016

Plaintiff's Rebuttal Disclosures : 04/05/2016

Plaintiff's 15-day Rebuttal Period Ends : 05/03/2016

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**

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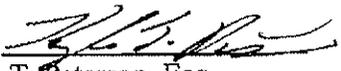
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and 91213082*

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 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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