

ESTTA Tracking number: **ESTTA710267**

Filing date: **11/23/2015**

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	Stipulated/Consent Motion to Extend
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Date	11/23/2015
Attachments	2015-11-23 Motion for Extension of Time.pdf(12857 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 Ninety (90) 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. On July 1, 2015, Opposers filed a Motion for a Sixty (60) Day Extension of Time with Consent that was granted by the Board on July 7, 2015. On August 28, 2015, Opposers filed a Motion for a Ninety (90) Day Extension of Time with Consent that was granted by the Board on September 1, 2015.

On October 13, 2015, Opposers filed an Addition of Correspondent adding new counsel for Opposer Coach, Inc. Accordingly, Opposers hereby move the Board for an Order granting an additional ninety (90) 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: 02/29/2016

Expert Disclosure Due : 03/21/2016

Discovery Closes : 04/18/2016

Plaintiff's Pretrial Disclosures : 06/02/2016

Plaintiff's 30-day Trial Period Ends : 07/18/2016

Defendant's Pretrial Disclosures : 08/01/2016

Defendant's 30-day Trial Period Ends : 09/15/2016

Plaintiff's Rebuttal Disclosures : 10/03/2016

Plaintiff's 15-day Rebuttal Period Ends : 10/31/2016

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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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2015, I caused a true and correct copy of the foregoing MOTION FOR A NINETY (90) 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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/Brittany D. Parling/