

ESTTA Tracking number: **ESTTA648353**

Filing date: **01/05/2015**

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

| | |
|------------------------|--|
| Proceeding | 91214091 |
| Party | Plaintiff Villanueva Holding Company LLC |
| Correspondence Address | William D. Raman Fleckman & McGlynn, PLLC P.O. Box 685108 Austin, TX 78768-5108 UNITED STATES trademarks@fleckman.com, raman@fleckman.com, klbynum@fleckman.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | William D. Raman |
| Filer's e-mail | trademarks@fleckman.com, raman@fleckman.com, klbynum@fleckman.com |
| Signature | /William D. Raman/ |
| Date | 01/05/2015 |
| Attachments | Motion for Further Extension.pdf(27362 bytes) |

TRADEMARK

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

| | | |
|----------------------------------|---|---|
| VILLANUEVA HOLDING COMPANY, LLC, | § | |
| | § | |
| Opposer, | § | |
| | § | |
| v. | § | Opposition Nos. 91214091 (parent case), |
| | § | 91214147 |
| DAVID REYNOSO URZUA | § | |
| A/K/A DAVID REYNOZO | § | |
| | § | |
| Applicant. | § | |

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**CONSENTED MOTION TO FURTHER EXTEND TIME
TO ANSWER COUNTERCLAIM AND TRIAL DATES**

Opposer, Villanueva Holding Company, LLC (“Opposer”), with the express consent of Applicant, David Reynoso Urzua a/k/a/ David Reynozo (“Applicant”), moves for a further extension of time of seven (7) days in which to answer or otherwise plead in response to the Counterclaim filed by Applicant. Opposer also requests that all subsequent dates be similarly extended by seven days.

The parties continue to be engaged in negotiations for the settlement of this matter. The additional requested time is therefore necessary to allow the parties time to finalize the terms of settlement, if possible.

In view of the facts set forth herein, Opposer submits that there is good cause for the requested extension and respectfully requests that the Board grant this Motion, and extend the deadlines as set forth below:

| | |
|---|------------|
| Time to Answer : | 01/12/2015 |
| Deadline for Discovery Conference : | 02/11/2015 |
| Discovery Opens : | 02/11/2015 |
| Initial Disclosures Due : | 03/13/2015 |
| Expert Disclosures Due : | 07/11/2015 |
| Discovery Period to Close : | 08/10/2015 |
| Plaintiff Pretrial Disclosures : | 09/24/2015 |
| Plaintiff's 30-day Trial Period Ends : | 11/08/2015 |
| Defendant/Counterclaim Plaintiff's Pretrial Disclosures : | 11/23/2015 |
| 30-day Trial Period for Defendant and Plaintiff in the Counterclaim : | 12/17/2015 |
| Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due : | 01/22/2016 |
| 30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends: | 03/07/2016 |
| Counterclaim Plaintiff's Rebuttal Disclosures Due: | 03/22/2016 |
| 15-day Rebuttal Period for Counterclaim Plaintiff Ends : | 04/21/2016 |
| Plaintiff's Trial Brief Due : | 06/20/2016 |
| Defendant's Trial Brief and Plaintiff in the Counterclaim Due : | 07/20/2016 |
| Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due : | 08/19/2016 |
| Reply Brief, if any, for Plaintiff in the Counterclaim Due : | 09/03/2016 |

Respectfully submitted,

By: /William D. Raman/

William D. Raman
FLECKMAN & MCGLYNN, PLLC
P. O. Box 685108
Austin, TX 78768-5108

ATTORNEY FOR OPPOSER,
VILLANUEVA HOLDING
COMPANY, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 5, 2015, a copy of the foregoing Consented Motion to Further Extend Time to Answer Counterclaim and Trial Dates was served upon counsel for David Reynozo by electronic mail at wsp@NJPLS.com as agreed by the parties.

/William D. Raman/
William D. Raman