

ESTTA Tracking number: **ESTTA658338**

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

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

Proceeding	91214224
Party	Defendant KCI Licensing, Inc.
Correspondence Address	PAMELA B HUFF COX SMITH MATTHEWS INCORPORATED 112 E PECAN ST STE 1800 SAN ANTONIO, TX 78205-1521 UNITED STATES ipdocket@coxsmith.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kristi F. Dent
Filer's e-mail	ipdocket@coxsmith.com, acorea@ssjr.com
Signature	/kfdent/
Date	02/27/2015
Attachments	SANOVAS.pdf(1146683 bytes)

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

Sanovas, Inc.	§	
Opposer	§	
vs.	§	Opposition No.: 91214224
	§	
KCI Licensing, Inc.	§	
Applicant.	§	

Commissioner for Trademarks
BOX TTAB – NO FEE
P. O. Box 1451
Alexandria, VA 22313-1451

**AGREED MOTION TO RESET SCHEDULING ORDER DATES
AND TO ENLARGE TIME TO ANSWER NOTICE OF OPPOSITION**

Applicant, KCI Licensing, Inc. (Applicant), with the consent of the Opposer, Sanovas, Inc. pursuant to TBMP 316.03 and 509.01(a), requests that the deadline to file Applicant’s Answer and all remaining deadlines be extended an additional 30 days as set forth below.

Applicant and Opposer agreed to the extension via email by their Counsel on Thursday, February 26, 2015.

In response to the Board’s Order dated February 17, 2015, the following is a report of the progress made to date, which the parties believe clearly establishes the good cause showing needed for this consented motion.

To date, there has been no discovery, but the parties have exchanged multiple drafts of a Settlement Agreement which stipulates the rights and obligations of each party. The most recent draft was sent to the Applicant on January 23, 2015. This draft was forwarded to Applicant’s representative who only recently returned from an extended business trip out of the country. In Applicant’s opinion, the Settlement Agreement will be ready for signature before the next requested extended Answer deadline, April 1, 2015.

Pursuant to the agreement of the parties in this proceeding, it is hereby requested, in accordance with 37 C.F.R. §2.121(d), that the scheduling order be reset as follows:

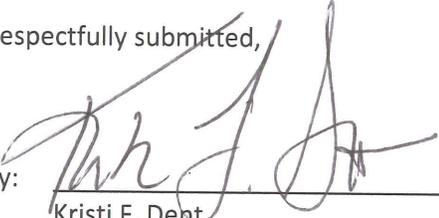
Time to Answer	04/01/2015
Deadline for Discovery Conference	05/01/2015
Discovery Opens	05/01/2015
Initial Disclosures Due	05/31/2015
Expert Disclosures Due	09/28/2015
Discovery Closes	10/28/2015
Plaintiff’s Pretrial Disclosures	12/12/2015
Plaintiff’s 30-day Trial Period Ends	01/26/2016
Defendant’s Pretrial Disclosures	02/10/2016

Defendant's 30-day Trial Period Ends	03/26/2016
Plaintiff's Rebuttal Disclosures	04/10/2016
Plaintiff's 15-day Rebuttal Period Ends	05/10/2016

The above schedule is sought in order to facilitate the parties' orderly conduct of the proceedings and settlement efforts. The Parties respectfully request that the Board grant this Agreed Motion to Reset Scheduling Order Dates and to Enlarge Time to Answer Notice of Opposition.

Respectfully submitted,

By:



Kristi F. Dent
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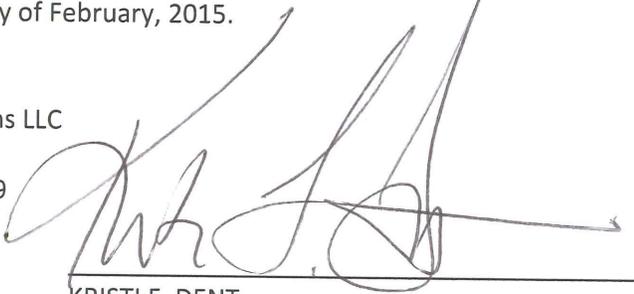
ATTORNEYS FOR APPLICANT

Dated: February 27, 2015

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Agreed Motion to Reset Scheduling Order Dates and to Enlarge Time to Answer Notice of Opposition has been deposited with the United States Postal Service as First Class Mail addressed: BOX TTAB – NO FEE, Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513, and served by email to the following party on the 27th day of February, 2015.

Andy I. Corea (Mr.)
St. Onge Steward Johnston & Reens LLC
986 Bedford Street
Stamford, Connecticut 06905-5619



KRISTI F. DENT