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Filing date: **03/26/2014**

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

Proceeding	91214501
Party	Defendant Larry A. Donoso
Correspondence Address	JOHN W GOLDSCHMIDT JR FERENCE & ASSOCIATES LLC 409 BROAD STREET PITTSBURGH, PA 15143 UNITED STATES uspto@ferencelaw.com, jgoldschmidt@ferencelaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	John W. Goldschmidt, Jr.
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Signature	/John W. Goldschmidt, Jr./
Date	03/26/2014
Attachments	20140326HerstPREFStipulatedMotionExtendTimeToAnswerNoticeOfOpposition.pdf(324779 bytes )

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

<b>HERST HOLDINGS, INC.,</b>	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No. 91214501
	:	
<b>LARRY A. DONOSO,</b>	:	
	:	
Applicant.	:	
	:	

**STIPULATED MOTION TO EXTEND TIME  
FOR APPLICANT TO FILE ANSWER**

Pursuant to Federal Rule of Civil Procedure 6(b), and Rule 2.117(c) of the Trademark Rules of Practice, 37 C.F.R. § 2.117(c), Applicant, Larry A. Donoso, by and through the undersigned counsel, hereby moves to extend the time by thirty (30) days, through and including April 25, 2014, for Applicant to file an answer or otherwise plead in response to the Notice of Opposition filed by Opposer, Hearst Holdings, Inc. on January 15, 2014. Applicant’s answer or other responsive pleading is currently due to be filed by March 26, 2014.

Applicant's counsel, Maureen Walsh Sheehan, Esquire, stipulated to this extension in correspondence with the undersigned on March 26, 2014.

Good cause in support of this motion is present in view of current posture of the settlement negotiations between the parties. Trademark Rule 2.117(c) provides that,

“[p]roceedings may also be suspended for good cause, upon motion or a stipulation of the parties approved by the Board.” Good cause is established when the parties are engaged in settlement negotiations. *See* Trademark Trial and Appeal Board Manual of Procedure § 510.03(a). The parties are currently engaged in such settlement negotiations.

This request is made in the interests of justice, not for the purposes of undue delay, and granting such a suspension should result in economies of time and expense to the Trademark Trial and Appeal Board as well as the parties.

### **CONCLUSION**

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that the Board grants the parties stipulated request to extend the time for Applicant to answer or otherwise plead in response to the Notice of Opposition filed in the above-identified proceeding. Applicant further requests that the Board reset the trial dates upon resumption of this proceeding.

The Commissioner is hereby authorized to charge any deficiencies or credit any overpayment related to this submission to Deposit Account Number 50-5017.

Respectfully submitted,

/John W. Goldschmidt, Jr./

John W. Goldschmidt, Jr.

Registration No: 34,828

**FERENCE & ASSOCIATES LLC**

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Pittsburgh, Pennsylvania 15143

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Date: **March 26, 2014**

**Attorneys for Applicant**

**CERTIFICATE OF SERVICE**

This is to certify that the attached Stipulated Motion To Extend Time For Applicant To File Answer was served upon the Opposer on March 26, 2014, by the undersigned depositing a true and correct copy of the document in first class, United States mail, postage prepaid, to the following address:

Maureen Walsh Sheehan, Esquire  
Hearst Corporation  
300 West 57<sup>th</sup> Street  
New York, New York 10019

/John W. Goldschmidt, Jr./  
John W. Goldschmidt, Jr.