

ESTTA Tracking number: **ESTTA695318**

Filing date: **09/11/2015**

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

Proceeding	91217319
Party	Defendant Barocco Roma s.r.l. Unipersonale
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Chiara Giuliani
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Signature	/Chiara Giuliani/
Date	09/11/2015
Attachments	Motion to extend.pdf(86340 bytes )

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

RAG & BONE HOLDINGS, LLC :  
Plaintiff :  
v. : Opp. No. 91217319  
BAROCCO ROMA S.R.L. UNIPERSONALE :  
Defendant :

**DEFENDANT'S MOTION FOR EXTENSION OF TIME  
WITH CONSENT**

Defendant Barocco Roma S.r.l. Unipersonale hereby moves that all dates in the above referenced proceeding be extended and reset as follows.

Initial Disclosures Due :	10/14/2015
Expert Disclosures Due :	02/11/2016
Discovery Period to Close :	03/12/2016
Plaintiff Pretrial Disclosures :	04/26/2016
Plaintiff's 30-day Trial Period Ends :	06/10/2016
Defendant's Pretrial Disclosures :	06/25/2016
Defendant's 30-day Trial Period ends :	08/09/2016
Plaintiff's Rebuttal Disclosures :	08/24/2016
Plaintiff's 15-day Rebuttal Period Ends :	09/23/2016

The parties are engaged in settlement negotiations. Defendant is reviewing a written agreement that it will shortly send to Plaintiff. However, Defendant's offices which are located in Italy only recently re-opened after the summer holidays. The additional time is needed so that Plaintiff can review the proposed agreement with counsel, and propose any modifications Plaintiff believes are necessary.

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

BAROCCO ROMA S.R.L. UNIPERSONALE

By 

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**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing is being served upon Plaintiff's counsel Marc S. Reiner of Hand Baldachin & Amburgey LLP at 8 West 40th Street, 12th Floor, New York, New York 10018, by first class mail, postage prepaid on September 11, 2015.

