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

Proceeding	91217464
Party	Plaintiff Sony Pictures Television Inc.
Correspondence Address	Aryn M. Emert Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES trademark@cll.com
Submission	Stipulated/Consent Motion to Extend
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Signature	/Aryn M. Emert/
Date	12/15/2014
Attachments	MOCS - FOR THAT REASON - DECEMBER 15 2014.pdf(10513 bytes)

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

In re Application Serial No. 86/101,155
Filed: October 25, 2013
For Mark: FOR THAT REASON, I'M OUT. I'M OUT
Published in the *Official Gazette* of March 25, 2014

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SONY PICTURES TELEVISION INC.,	:	
	:	
Opposer,	:	Opposition No. 91217464
	:	
- against -	:	
	:	
WALLACE OM ROTHSMAN and	:	
SPEEDVENTURE HOLDINGS, INC.	:	
	:	
Applicants.	:	

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**MOTION ON CONSENT TO EXTEND APPLICANT’S TIME TO RESPOND TO
OPPOSER’S CROSS-MOTION FOR ENTRY OF A DEFAULT JUDGMENT**

Opposer, by and through counsel, hereby moves for an extension of Applicant’s deadline to respond to Opposer’s Cross-Motion for Entry of a Default Judgment by thirty (30) days, until **January 18, 2015**. The Applicant consented to this motion, which is requested to allow the parties to engage in settlement discussions.

The parties remind the Board that Opposer filed a Notice of Opposition in this matter on July 21, 2014. The order instituting this opposition was mailed by the Board that same date, causing Applicant’s Answer deadline to be August 30, 2014. On August 29, 2014, Applicant filed a Motion for Summary Judgment. Thereafter, on October 2, 2014, Opposer filed Opposer’s Opposition to Applicants’ Motion for Summary Judgment and Cross-Motion for Entry of a

Default Judgment, making Applicant's deadline to respond to Opposer's Cross-Motion for Entry of a Default Judgment October 20, 2014. As the parties were engaged in settlement discussions that would potentially resolve the matter without the need to proceed with the Opposition, the parties filed a request with the Board on October 17, 2014 to extend Applicant's response deadline to Opposer's Cross-Motion for Entry of a Default Judgment sixty (60) days.

As the parties are still engaged in settlement discussions, they request that the Board extend Applicant's response deadline to Opposer's Cross-Motion for Entry of a Default Judgment an additional thirty (30) additional days, as set forth above.

In the event that the matter is not able to resolved, and Opposer's Cross-Motion for Entry of Default Judgment is denied, the parties request that the Board reset the trial deadlines accordingly.

Dated: New York, New York
December 15, 2014

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Aryn M. Emert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 15, 2014, I caused a true and correct copy of the foregoing Motion to Extend to be sent via First Class Mail, postage prepaid, to Applicant's Correspondent of Record, Wallace Rothsman, Roc Nation Ventures, LLC, 2221 NE 164th St., Suite 296, Aventura, Florida 33160-3703.

/Aryn M. Emert/
Aryn M. Emert