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Filing date: **06/09/2015**

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

| | |
|------------------------|---|
| Proceeding | 91219179 |
| Party | Defendant United Yacht Transport LLC dba United Yacht Transport |
| Correspondence Address | BRYAN D HULL BUSH ROSS PA PO BOX 3913 TAMPA, FL 33602 UNITED STATES bhull@bushross.com, avianueva@bushross.com, jprobasco@bushross.com, rsterns@bushross.com, ebishop@bushross.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Bryan D. Hull |
| Filer's e-mail | bhull@bushross.com, avianueva@bushross.com |
| Signature | /Bryan D. Hull/ |
| Date | 06/09/2015 |
| Attachments | Motion_to_extend_deadlines_pdf.PDF(79722 bytes) |

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

SPLIETHOFF'S BEVRACHTINGSKANTOOR B.V.,

Opposer,

vs.

**Opposition No. 91219179
Serial No. 86031633**

UNITED YACHT TRANSPORT LLC,

Applicant.

CONSENT MOTION TO EXTEND CASE MANAGEMENT DEADLINES

Applicant, United Yacht Transport LLC, respectfully requests that the case management deadlines in this proceeding be extended by four months. The undersigned counsel has been involved in a complex trial requiring extensive preparation over the last several months, and therefore, requires additional time to complete discovery in this matter. While the parties have taken documentary discovery, additional discovery, including numerous depositions, still remains to be completed. Accordingly, the parties have determined that under the circumstances, the current deadlines cannot reasonably be met. Although a three month extension would likely be sufficient, it would place Opposer's trial period during the holiday season. The parties have conferred and agreed upon the following revised deadlines:

| | |
|---|------------|
| Expert Disclosures Due | 10/12/2015 |
| Discovery Closes | 11/13/2015 |
| Plaintiff's Pretrial Disclosures | 12/23/2015 |
| Plaintiff's 30-day Trial Period Ends | 2/10/2016 |
| Defendant's Pretrial Disclosures | 2/25/2016 |
| Defendant's 30-day Trial Period Ends | 3/9/2016 |
| Plaintiff's Rebuttal Disclosures | 3/24/2016 |
| Plaintiff's 15-day Rebuttal Period Ends | 4/22/2016 |

WHEREFORE, United Yacht Transport LLC respectfully requests that the deadlines be extended as set forth above. Opposer has consented to the relief requested herein.

Respectfully submitted,

BUSH ROSS, P.A.

Dated: June 9, 2015

By: /s/ Bryan D. Hull

Bryan D. Hull

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Attorneys for United Yacht Transport, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Answer has been served on J. Michael Pennekamp and Sandra I. Tart by mailing said copy on June 9, 2015, via First Class Mail, postage prepaid to: J. Michael Pennekamp and Sandra I. Tart, FOWLER WHITE BURNETT, P.A., Espirito Santo Plaza, Fourteenth Floor, 1395 Brickell Avenue, Miami, Florida 33131, and by email to: jpennekamp@fowler-white.com and start@fowler-white.com.

Signature: /s/ Bryan D. Hull
Date: June 9, 2015