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

Proceeding	91220611
Party	Defendant Societa' Agricola LA RAIA S.S.
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Submission	Stipulated/Consent Motion to Extend
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Date	05/24/2016
Attachments	2016-05-24 Consent Motion to Extend All Deadlines by 60 Days.pdf(10160 bytes )

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

In the Matter of:

Application Serial No.:	86/146,041
Application Date:	December 17, 2013
Applied-for Mark:	TENIMENTI ROSSI CAIRO

E & J GALLO WINERY,

*Opposer,*

v.

SOCIETA' AGRICOLA LA RAIA S.S.,

*Applicant.*

Opposition No.: 91220611

**CONSENT MOTION TO EXTEND ALL DEADLINES BY 60 DAYS**

On May 17, 2016, Applicant filed a consent motion, seeking an extension of all deadlines in the above-captioned opposition proceeding by 60 days. On May 24, 2016, the Board denied Applicant's May 17 motion without prejudice on the ground that it did not contain "a detailed explanation of the progress the parties have made towards settlement." Accordingly, Applicant, with Opposer's consent, states as follows:

The parties have exchanged near-final drafts of a co-existence agreement that would simultaneously resolve this proceeding and a proceeding currently pending before the European Union Intellectual Property Office. The parties reasonably anticipate executing and exchanging final settlement documents within the next 60 days.

Based on the foregoing, Applicant, with Opposer's consent, respectfully requests that the Board grant Applicant's May 17 motion to extend all deadlines in this proceeding by 60 days (including the deadline for Applicant's Answer).

Dated: May 24, 2016

Respectfully submitted,

/s/ Jonathan W. Thomas

James E. Rosini

Jonathan W. Thomas

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**CERTIFICATE OF SERVICE**

I, Jonathan W. Thomas, hereby certify that I filed the foregoing document, titled **Consent Motion to Extend all Deadlines by 60 Days**, on May 24, 2016 by using the Board's Electronic System for Trademark Trials and Appeals, which will transmit electronic notification of such filing to Opposer's counsel.

*/s/ Jonathan W. Thomas*

Jonathan W. Thomas

*Counsel for Applicant*