

ESTTA Tracking number: **ESTTA750300**

Filing date: **06/03/2016**

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

Proceeding	91221326
Party	Defendant CityCenter Land, LLC
Correspondence Address	MICHAEL J MCCUE LEWIS ROCA ROTHGERBER LLP 3993 HOWARD HUGHES PKWY STE 600 LAS VEGAS, NV 89169 UNITED STATES Trademarks-LasVe- gas@LRRRC.com,MMcCue@LRRRC.com,ZGordon@LRRRC.com
Submission	Motion to Extend
Filer's Name	Michael J. McCue
Filer's e-mail	TRADEMARKS-LASVEGAS@LRRRC.COM, MMCCUE@LRRRC.COM, ZGORDON@LRRRC.COM
Signature	/Michael J. McCue/
Date	06/03/2016
Attachments	BARDOTDISC.pdf(18553 bytes)

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

HOLLYWOOD ENTERTAINMENT, LLC dba)
AVALON and dba BARDOT,)
)
) Opposer,)
) Opposition No. 91221326
vs.)
) Serial No. 86/243405
CITYCENTER LAND, LLC,)
)
) Applicant.)
_____)

MOTION TO EXTEND DISCOVERY DEADLINES

Applicant CityCenter Land, LLC, through its undersigned attorneys, hereby moves to extend the close of the discovery period in the above-captioned proceeding to sixty (60) days from the date of the Trademark Trial and Appeal Board's ruling on this motion and to reset all trial dates accordingly.

The parties were engaged in ongoing, good faith settlement negotiations during the discovery period and during the suspension of this opposition. The settlement negotiations have recently stalled and Opposer has refused to respond to Applicant's repeated requests to extend discovery and to discuss settlement. This motion is made in a good faith to allow both parties sufficient time and opportunity to conduct and respond to discovery and is not made for reasons of delay.

///

///

///

///

Dated this 3rd day of June, 2016.

LEWIS ROCA ROTHGERBER CHRISTIE LLP



By:

Michael J. McCue
Zachary T. Gordon
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, Nevada 89169
Tel: 702-949-8200
Fax: 702-949-8363
Attorneys for Applicant

CERTIFICATE OF SERVICE

I, Tammy L. Bunch, hereby certify that a true and accurate copy of the foregoing **MOTION TO EXTEND DISCOVERY DEADLINES** has been served upon all parties, at their address of record, as shown below, by First Class Mail, postage prepaid, on this 3rd day of June, 2016.

Address listed with the TTAB:

Christie Gaumer, Esq.
3940 Laurel Canyon Blvd., No. 733
Los Angeles, CA 90028

Address in Opposition Signature Block and verified with USPS.com:

Christie Gaumer, Esq.
LAW OFFICES OF CHRISTIE GAUMER
3940 Laurel Canyon Blvd., No. 733
Studio City, CA 91604

/s/ Tammy L. Bunch
An employee of Lewis Roca Rothgerber LLP