

ESTTA Tracking number: **ESTTA711009**

Filing date: **11/25/2015**

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

Proceeding	91221978
Party	Plaintiff LT Overseas North America, Inc.
Correspondence Address	STEVEN J NATAUPSKY KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@knobbe.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Nicole Rossi Townes
Filer's e-mail	efiling@knobbe.com
Signature	/Nicole R. Townes/
Date	11/25/2015
Attachments	Counter-Defendant's Consented Motion for Ext of Time to Answer LT-FOO.060M.pdf(171004 bytes )

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

LT Overseas North America, Inc.,	)	Opposition No.: 91221978
	)	
Opposer,	)	Mark: ROYAL GREENLAND
	)	
v.	)	
	)	
Royal Greenland A/S,	)	
	)	
Applicant.	)	

**COUNTER-DEFENDANT’S CONSENTED MOTION FOR  
EXTENSION OF TIME TO ANSWER**

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

Counter-defendant’s time to answer counter-plaintiff’s counterclaim is currently set to close on 11/27/2015. Counter-defendant LT Overseas North America, Inc. requests that such date be extended for 30 days, or until 12/27/2015, and that all subsequent dates be reset accordingly.

<b>Answer to Counterclaim Due :</b>	12/27/2015
<b>Deadline for Discovery Conference :</b>	01/26/2016
<b>Discovery Opens :</b>	01/26/2016
<b>Initial Disclosures Due :</b>	02/25/2016
<b>Expert Disclosure Due :</b>	06/24/2016
<b>Discovery Closes :</b>	07/24/2016
<b>Plaintiff's Pretrial Disclosures :</b>	09/07/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	10/22/2016
<b>Defendant's/Counterclaim Plaintiff's Pretrial Disclosures :</b>	11/06/2016
<b>30-day Trial Period for defendant and plaintiff in counterclaim Ends :</b>	12/21/2016
<b>Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures :</b>	01/05/2017
<b>30-day Trial Period for defendant in the counterclaim and rebuttal testimony for plaintiff Ends :</b>	02/04/2017

**Counterclaim Plaintiff's Rebuttal Disclosures**

**Due :** 03/06/2017

**15-day rebuttal period for plaintiff in the counter-claim to close :** 05/04/2017

**Brief for plaintiff due :** 07/03/2017

**Brief for defendant and plaintiff in the counterclaim due :** 08/02/2017

**Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due :** 09/01/2017

**Reply brief, if any, for plaintiff in the counterclaim due :** 09/16/2017

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

LT Overseas North America, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: November 25, 2015

By:  \_\_\_\_\_

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Attorneys for Opposer,  
LT Overseas North America

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **COUNTER-DEFENDANT'S CONSENTED MOTION FOR EXTENSION OF TIME TO ANSWER** upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid, on November 25, 2015, addressed as follows:

Bassam N. Ibrahim  
Buchanan Ingersoll & Rooney PC  
1737 King Street, Suite 500  
Alexandria, VA 22314



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Sarah Beno Couvillion

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