

ESTTA Tracking number: **ESTTA713220**

Filing date: **12/08/2015**

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

Proceeding.	91223971
Applicant	Plaintiff Universal City Studios LLC
Other Party	Defendant Vatche Kiwanian DBA US Batta
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 05/30/2016. Universal City Studios LLC requests that such date be extended for 90 days, or until 08/28/2016, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	07/29/2016
Discovery Closes :	08/28/2016
Plaintiff's Pretrial Disclosures :	10/12/2016
Plaintiff's 30-day Trial Period Ends :	11/26/2016
Defendant's Pretrial Disclosures :	12/11/2016
Defendant's 30-day Trial Period Ends :	01/25/2017
Plaintiff's Rebuttal Disclosures :	02/09/2017
Plaintiff's 15-day Rebuttal Period Ends :	03/11/2017

The grounds for this request are as follows:

- *The parties have agreed that settlement of this opposition proceeding is the preferred course of action. A draft settlement proposal is currently being prepared by Applicant's counsel. Counsel for each party agree that the time and expense of conducting, what will likely be an unnecessary, Discovery Conference should be avoided, if possible. Therefore, the parties request grant of this request for extension of time in advance of the Discovery Conference being conducted.*

Universal City Studios LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Universal City Studios LLC has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Tristram R. Fall III/

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