

ESTTA Tracking number: **ESTTA740376**

Filing date: **04/15/2016**

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

Proceeding	91225899
Party	Defendant RADIAL ENGINEERING LTD.
Correspondence Address	TODD BRAVERMAN PEARL COHEN ZEDEK LATZER BARATZ LLP 1500 BROADWAY, 12TH FLOOR NEW YORK, NY 10036 UNITED STATES tm-uspto@pearlcohen.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Todd Braverman
Filer's e-mail	tm-uspto@pearlcohen.com
Signature	/tjbraverman/
Date	04/15/2016
Attachments	Motion to Extend Discovery Deadlines - DYNACO - April 15, 2016.pdf(58395 bytes)

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

In the Matter of U.S. Application No. 86/432,541

PANOR CORP.,)	
)	Opposition No. 91225899
v.)	U.S. Application No. 86/432,541
)	
RADIAL ENGINEERING LTD.,)	Mark: DYNACO
)	
)	Applicant.
)	
)	

Trademark Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1451
Alexandria, VA 22313-1451

**MOTION FOR AN EXTENSION OF
DISCOVERY OR TRIAL PERIODS WITH CONSENT**

Applicant, Radial Engineering LTD., through its counsel, hereby moves the Trademark Trial & Appeal Board to extend the time for the parties in the above Opposition Proceeding to exchange initial disclosures for thirty (30) days from April 28, 2016 and all subsequent discovery and trial dates for thirty (30) days from the dates listed in the TTAB Order dated January 19, 2016 in accordance with the below revised trial schedule:

Time to Answer	CLOSED
Deadline for Discovery Conference	CLOSED
Discovery Opens	CLOSED
Initial Disclosures Due	5/28/2016
Expert Disclosures Due	9/25/2016
Discovery Closes	10/25/2016
Plaintiff's Pretrial Disclosures	12/9/2016
Plaintiff's 30-day Trial Period Ends	01/23/2017
Defendant's Pretrial Disclosures	2/7/2017
Defendant's 30-day Trial Period Ends	3/24/2017
Plaintiff's Rebuttal Disclosures	4/8/2017
Plaintiff's 15-day Rebuttal Period Ends	5/8/2017

This time is needed in order for each party to confer with their respective clients and allow additional time to discuss discovery related matters and the possibility of settlement.

The foregoing motion is not being filed for the purpose of mere delay of the proceedings and favorable consideration of this request is respectfully solicited.

Applicant has secured the express consent of all parties to this proceeding for the extension and resetting of dates requested herein.

Dated: New York, New York
April 15, 2016

Respectfully submitted,



By: _____

Todd Braverman, Esq.
 Pearl Cohen Zedek Latzer LLP
 1500 Broadway, 12th Floor
 New York, New York 10036
 (646) 878-0820
 Attorneys for Applicant
 Radial Engineering LTD

