

ESTTA Tracking number: **ESTTA746276**

Filing date: **05/13/2016**

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	05/13/2016
Attachments	Motion to Extend Discovery Deadlines DYNACO May 13 2016.pdf(59063 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

**SECOND 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 May 28, 2016 and all subsequent discovery and trial dates for sixty (60) days from the dates listed in the TTAB Order dated January 19, 2016 in accordance with the below revised trial schedule [Note – The Parties filed a Motion for a Thirty (30) Day Extension of Discovery or Trial Periods with Consent on April 15, 2016, which the TTAB has not yet granted]:

Time to Answer	CLOSED
Deadline for Discovery Conference	CLOSED
Discovery Opens	CLOSED
Initial Disclosures Due	06/27/2016
Expert Disclosures Due	10/25/2016
Discovery Closes	11/24/2016
Plaintiff's Pretrial Disclosures	01/08/2016
Plaintiff's 30-day Trial Period Ends	02/22/2017
Defendant's Pretrial Disclosures	03/09/2017
Defendant's 30-day Trial Period Ends	04/23/2017
Plaintiff's Rebuttal Disclosures	05/08/2017
Plaintiff's 15-day Rebuttal Period Ends	06/07/2017

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  
May 13, 2016

Respectfully submitted,



By: \_\_\_\_\_  
 Todd Braverman, Esq.  
 Pearl Cohen Zedek Latzer Baratz LLP  
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 (646) 878-0820  
 Attorneys for Applicant  
 Radial Engineering LTD

**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

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PANOR CORP.,	)
	)
v.	)
	)
	)
RADIAL ENGINEERING LTD.,	)
	)
Applicant.	)
	)
----- x	

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing “**SECOND MOTION FOR AN EXTENSION OF DISCOVERY OR TRIAL PERIODS WITH CONSENT**” was e-mailed to Laura Goldbard George, Stooch & Stooch & Lavan LLP, 180 Maiden Lane, New York, NY 10038-4982, attorneys for Opposer, at [lgoldbard@stroock.com](mailto:lgoldbard@stroock.com) and [tm@stroock.com](mailto:tm@stroock.com), on the 13th day of May, 2016.

Date: May 13, 2016

*Todd Braverman*

\_\_\_\_\_  
Todd Braverman Esq.