

ESTTA Tracking number:

ESTTA212459

Filing date:

05/19/2008

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

Proceeding	92044040
Party	Plaintiff Karin Models, S.A.R.L.
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Submission	Motion to Extend
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Date	05/19/2008
Attachments	karin.pdf (3 pages)(14501 bytes)

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

KARIN MODELS, S.A.R.L.)	
)	
Petitioner,)	Cancellation No. 92044040
)	Marks: KARIN and KARIN MODELS
v.)	
BRUNEL, JEAN LUC,)	
)	
Registrant.)	

MOTION UPON CONSENT FOR EXTENSION OF DEADLINES

Petitioner Karin Models, S.A.R.L. requests a sixty day (60) extension of the deadlines, upon consent of Registrant, Jean Luc Brunel.

1. Petitioner requests that the TTAB extend the deadlines by sixty (60) days in the instant case. Currently the discovery cut off deadline is May 19, 2008. Petitioner requests that the deadlines in the instant case be extended by an additional sixty (60) days. Registrant consents to the instant extension.

2. The parties have been in settlement negotiations and have previously been granted two (2) prior deadlines. In the order recently issued on April 26, 2008, the TTAB noted that any further extensions of time must be accompanied by a detailed report of the progress of settlement negotiations. However, due to time constraints as the order was just recently issued, as well as the facts that undersigned's corporate contact at Petitioner, which is located in Paris, France, has been recently hospitalized and undersigned is currently at the annual International Trademark Conference in Berlin, Germany, Petitioner and Respondent do not have a detailed report to provide to the TTAB regarding settlement.

3. Concurrently proceeding is a matter in the state court of Florida, which involves the same parties, but different attorneys. The parties were in settlement discussions with respect

to the state court action and the TTAB action. However, undersigned has not been able to obtain more detailed information to provide to the TTAB due to the fact that the contact at Petitioner has been hospitalized and that undersigned is at the INTA annual conference in Berlin. Undersigned is an active member of INTA and serves on a committee. Counsel for Respondent was not able to provide more detailed information, but counsel have set up a telephone conference to discuss further upon undersigned's return from Berlin, Germany. Moreover, the order requiring a detailed report was only recently issued.

4. The instant motion is made in good faith and not for the purpose of delay.

WHEREFORE, Petitioner requests that the TTAB extend the deadlines by sixty (60) days in the instant matter.

DATE: May 19, 2008

Respectfully submitted,

Karin Models, S.A.R.L.

By: /ews/

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CERTIFICATE OF MAIL AND CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading is being submitted electronically via the Electronic System for the Trademark Trial and Appeal Board and via electronic mail and regular first class mail to the following on the 19th day of May, 2008:

Steven Kozlowski
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steven@klfpa.com

/ews/
Erica W. Stump