

ESTTA Tracking number: **ESTTA525725**

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

Proceeding.	92048732
Applicant	Plaintiff Altwater Gessler - J.A. Baczewski International (USA) Inc. and Altwater Gessler - J.A. Baczewski GmbH
Other Party	Defendant Ronald Beckenfeld

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

The Close of Plaintiff's Trial Period is currently set to close on 05/04/2013. Altwater Gessler - J.A. Baczewski International (USA) Inc. and Altwater Gessler - J.A. Baczewski GmbH requests that such date be extended for 60 days, or until 07/03/2013, 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 :	CLOSED
Discovery Closes :	CLOSED
Plaintiff's Pretrial Disclosures :	05/19/2013
Plaintiff's 30-day Trial Period Ends :	07/03/2013
Defendant's Pretrial Disclosures :	07/18/2013
Defendant's 30-day Trial Period Ends :	09/01/2013
Plaintiff's Rebuttal Disclosures :	09/16/2013
Plaintiff's 15-day Rebuttal Period Ends :	10/16/2013

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *Parties are engaged in settlement discussions*
- *The parties are unable to complete discovery before the start of the trial period. Although the discovery period has closed, there are some outstanding discovery issues including responding to discovery requests served before the end of the period, document production, and deposition. The parties also continue to discuss possible settlement. On February 25, 2013, respondent made a new settlement proposal to petitioner. The parties are continuing to discuss that new offer.*

Altwater Gessler - J.A. Baczewski International (USA) Inc. and Altwater Gessler - J.A. Baczewski GmbH has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Altwater Gessler - J.A. Baczewski International (USA) Inc. and Altwater Gessler - J.A. Baczewski GmbH 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 Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/peter sloane/

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