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

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|------------------------|---|
| Proceeding | 92052048 |
| Party | Defendant Dassa Holdings Ltd. |
| Correspondence Address | JEREMY M ROE NEAL & MCDEVITT LLC 1776 ASH STREET NORTHFIELD, IL 60093 UNITED STATES pto@nealmcdevitt.com, lisa.iverson@nealmcdevitt.com, jroe@nealmcdevitt.com |
| Submission | Opposition/Response to Motion |
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| Signature | /jmr/ |
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| Attachments | 20110727 Response to Motion to Extend.pdf (3 pages)(15014 bytes) |

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

SILK WATER SOLUTIONS INC.,

Petitioner,

v.

Cancellation Nos. 92052048, 92052049

DASSA HOLDINGS LTD.,

Respondent.

**RESPONDENT'S RESPONSE TO PETITIONER'S MOTION FOR EXTENSION OF
TRIAL PERIODS AND ALL SUBSEQUENT DATES**

Respondent DASSA HOLDINGS LTD. ("Dassa") hereby responds to Petitioner SILK WATER SOLUTIONS, INC.'s ("SWS") motion for a thirty-day extension of trial periods and all subsequent dates. Dassa opposes this motion. SWS has had an ample opportunity to take evidence but has failed to do so. SWS now wants another opportunity to take this evidence. Allowing this would only cause further delay.

SWS has failed to demonstrate good cause for its failure to request any trial testimony and evidence to date. SWS has not issued any written or oral discovery requests during the relevant discovery period (which has subsequently passed). To date, SWS has only provided Dassa with initial disclosures and pre-trial disclosures. Only now, after its thirty-day trial period has passed, has SWS expressed a desire to gather trial testimony.

While Dassa acknowledges that the parties have been engaged in ongoing settlement discussions, SWS bears the burden of proving facts that support its allegations of non-use by Dassa. SWS should not be allowed a further opportunity to gather evidence in support of its frivolous claims. To do so, as stated above, would only cause further delay to a case that has been outstanding for quite some time. SWS has had its opportunity to pursue its case and

attempt to prove its allegations (which Dassa states SWS will not be able to do). SWS has allowed those dates to pass, and it should not be allowed to get another bite at the apple.

Accordingly, Dassa requests that the Board deny SWS's motion for a thirty-day extension of trial periods and all subsequent dates.

Respectfully submitted,

Dated: July 27, 2011

By: /s/ Lisa A. Iverson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing RESPONDENT'S RESPONSE TO PETITIONER'S MOTION FOR EXTENSION OF TRIAL PERIODS AND ALL SUBSEQUENT DATES was served upon Counsel by e-mail on this 27th day of July, 2011:

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/s/ Jeremy M. Roe