

ESTTA Tracking number: **ESTTA483187**

Filing date: **07/13/2012**

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

Proceeding	92055330
Party	Plaintiff EPFF, LLC
Correspondence Address	THEODORE R REMAKLUS WOOD HERON & EVANS LLP 441 VINE STREET, 2700 CAREW TOWER CINCINNATI, OH 45202 UNITED STATES tremaklus@whe-law.com
Submission	Motion to Reopen
Filer's Name	Theodore R. Remaklus
Filer's e-mail	tremaklus@whe-law.com
Signature	/theodore r remaklus/
Date	07/13/2012
Attachments	Motion to reopen and extend.pdf (3 pages)(13243 bytes)

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

_____))
EPFF, LLC) Cancellation No. 92055330
))
) Petitioner,))
))
v.) Registration No. 3,975,645, IC 25
) Registered: June 7, 2011
))
David M. Glitzer))
))
))
Respondent.))
_____))

**CONSENT MOTION TO REOPEN THE ANSWER PERIOD
AND EXTEND THE REMAINING DEADLINES**

Petitioner, EPFF, LLC, with the consent of Respondent, David M. Glitzer, hereby requests that the Board reopen the answer deadline and grant a 30-day extension of time for Respondent to file its Answer to the Petition for Cancellation, as well as all other dates in the proceeding as follows:

Time to Answer:	8/6/2012
Deadline for Discovery Conference:	9/5/2012
Discovery Opens	9/5/2012
Initial Disclosures Due:	10/5/2012
Expert Disclosures Due:	2/2/2013
Discovery Closes:	3/4/2013
Plaintiff's Pretrial Disclosures:	4/18/2013
Plaintiff's 30-day Trial Period Ends:	6/2/2013
Defendant's Pretrial Disclosures:	6/17/2013

Defendant's 30-day Trial Period Ends: 8/1/2012

Plaintiff's Rebuttal Disclosures: 8/16/2013

Plaintiff's 15-day Rebuttal Period Ends: 9/15/2013

This motion is made in good faith, without any intent to cause delay or prejudice as the parties remain engaged in settlement discussions.

Applicant states that it has secured the express written consent for this motion from counsel for Respondent.

Respectfully submitted,

EPFF, LLC

Date: July 13, 2012

By: /s/ Theodore R. Remaklus

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Consent Motion to Reopen the Answer Period and Extend the Remaining Deadlines** has been served on counsel for Respondent identified below by electronic mail, per agreement of the parties, this 13th day of July, 2012:

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/s/ Theodore R. Remaklus
Theodore R. Remaklus

Attorney for Petitioner
EPFF, LLC