

ESTTA Tracking number: **ESTTA614828**

Filing date: **07/10/2014**

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

Proceeding	92056362
Party	Plaintiff Milano Series International Products, Ltd.
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Submission	Motion to Extend
Filer's Name	Jeffrey H. Kaufman
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Signature	/Jeffrey H. Kaufman/sr/
Date	07/10/2014
Attachments	92056362-Mtn to Ext.pdf(96907 bytes)

Expert Disclosure Due:	November 11, 2014
THE PERIOD FOR DISCOVERY TO CLOSE:	December 11, 2014
Plaintiff Pretrial Disclosures	January 25, 2015
Testimony period for the party in position of plaintiff to close (opening thirty days prior thereto)	March 11, 2015
Defendant Pretrial Disclosures	March 26, 2015
Testimony period for the party in position of defendant to close (opening thirty days prior thereto)	May 10, 2015
Plaintiff Rebuttal Testimony Disclosures	May 25, 2015
Rebuttal testimony period to close (opening fifteen days prior thereto)	June 24, 2015

The reason for this Motion to Extend is that Petitioner previously noted the FRCP Rule 30(b)(6) deposition of Respondent, but due to Respondent's principals travel schedule, they were unavailable on the date noted. Respondent's principals are traveling for the summer months outside the U.S. The parties are currently discussing alternative dates in the fall for Respondent's deposition(s). This extension was agreed to by Valerie Kuhar, on behalf of Matthew Swyers, counsel for Milano Bags Inc., in emails to Petitioner's counsel on June 30, 2014 and July 9, 2014.

Respectfully submitted,

MILANO SERIES INTERNATIONAL
PRODUCTS, LTD.

By: /Jeffrey H. Kaufman/
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Date: July 10, 2014
 RSB/JHK/klk {10475696_3.docx}

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **MOTION TO EXTEND DISCOVERY AND TRIAL DATES (WITH CONSENT)** was served on counsel for Respondent, this 10 day of July, 2014, by sending same via First Class mail, postage prepaid, to:

Matthew H. Swyers, Esquire
The Trademark Company PLLC
344 Maple Avenue West, Suite 151
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With courtesy copies by email to:
mshyers@thetrademarkcompany.com
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Soenya Randolph

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