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Filing date: **12/01/2014**

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

Proceeding	92058000
Party	Plaintiff Nash-Finch Company
Correspondence Address	HEATHER J KLIEBENSTEIN MERCHANT & GOULD PC PO BOX 2910 MINNEAPOLIS, MN 55402 0910 UNITED STATES jclifford@merchantgould.com, aavery@merchantgould.com, dockmpls@merchantgould.com, hkliebenstein@merchantgould.com, aries@merchantgould.com
Submission	Motion to Extend
Filer's Name	Heather Kliebenstein
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Signature	/Heather Kliebenstein/
Date	12/01/2014
Attachments	8897194_1.pdf(86326 bytes )

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

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Nash Finch Company	)	
	)	
Petitioner,	)	Cancellation No. 92058000
	)	
v.	)	Registration No. 4,283,988
	)	Mark: <b>OUR FAMILY FOUNDATION</b>
Ahold Licensing Sarl,	)	<b>&amp; DESIGN</b>
	)	
Respondent.	)	
	)	
	)	

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**JOINT MOTION TO EXTEND DISCOVERY AND ALL REMAINING DEADLINES BY  
EIGHTEEN DAYS**

The parties jointly request the Board extend the discovery period, and all remaining dates, by eighteen (18) calendar days. The Close of Discovery is set to close on November 29, 2014. This motion is timely filed as on the next business day after November 29, 2014, which fell on a Saturday. Nash Finch Company requests that such date be extended by 18 days, or until 12/17/2014, and that all subsequent dates be reset accordingly. The dates are set forth below:

Time to Answer: CLOSED  
Deadline for Discovery Conference: CLOSED  
Discovery Opens: CLOSED  
Initial Disclosures Due: CLOSED  
Expert Disclosure Due: CLOSED  
Discovery Closes: 12/17/2014  
Plaintiff's Pretrial Disclosures: 01/31/2015  
Plaintiff's 30-day Trial Period Ends: 03/17/2015  
Defendant's Pretrial Disclosures: 04/01/2015  
Defendant's 30-day Trial Period Ends: 05/16/2015  
Plaintiff's Rebuttal Disclosures: 05/31/2015  
Plaintiff's 15-day Rebuttal Period Ends: 06/30/2015

The parties believe good cause exists because despite reasonable efforts by the parties, they are unable to complete document production, interrogatory responses and testimony during the assigned period. Both parties consent to this extension request and resetting the dates requested herein.

Respectfully submitted,

NASH FINCH COMPANY

By its attorneys,

Date: December 1, 2014

s/Heather J. Kliebenstein  
John A. Clifford  
Heather J. Kliebenstein  
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AHOLD LICENSING, SÀRL

By its attorneys,

Date: December 1, 2014

s/Brian P. Gregg  
Harvey Freedenberg  
Brian P. Gregg  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Joint Motion to Extend Discovery and All Remaining Deadlines by Eighteen Days was served, via first-class mail, postage prepaid on this 1st day of December 2014.

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*Counsel for Ahold Licensing Sarl*

s/Abigail E. Ries  
Abigail E. Ries