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

Proceeding	92058315
Party	Defendant M22, LLC
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	John Di Giacomo
Filer's e-mail	john@revisionlegal.com
Signature	/JAD/
Date	08/24/2016
Attachments	08-24-16 Stipulated Joint Motion to Extend.pdf(71873 bytes) 08-24-16 Brief in Support Stipulated Joint Motion to Extend - tlh changes.pdf(70999 bytes)

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

State of Michigan,

Petitioner,

Proceeding Nos: 92058315

v.

M22, LLC,

Registrant.

STIPULATION AND JOINT MOTION TO EXTEND PROCEEDING SCHEDULE

Petitioner State of Michigan and Registrant M22, LLC, by and through their attorneys, hereby jointly request, pursuant to TBMP § 501.03 and 509.01(a), that the Board extend the proceeding schedule by thirty-six (36) days so that Registrant has additional time for discovery after Petitioner's designee is deposed pursuant to Fed. R. Civ. P. 30(b)(6). Filed herewith in support of this Motion is a memorandum of law in support of this Stipulation and Joint Motion.

PROOF OF SERVICE

I, John Di Giacomo, hereby certify and declare that on August 24, 2016, I served the foregoing Stipulated Joint Motion to Extend Proceeding Schedule on all attorneys of record via first class mail.

/s/ JAD

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

STATE OF MICHIGAN,

Petitioner,

Proceeding Nos: 92058315

v.

M22, LLC,

Registrant.

**BRIEF IN SUPPORT OF STIPULATION AND JOINT MOTION TO EXTEND
PROCEEDING SCHEDULE**

Petitioner State of Michigan and Registrant M22, LLC, by and through their attorneys, hereby jointly request, pursuant to TBMP § 501.03 and 509.01(a), that the Board extend the proceeding schedule by thirty-six (36) days so that Registrant has additional time for discovery after Petitioner's designee is deposed pursuant to Fed. R. Civ. P. 30(b)(6). For their Brief in Support of Stipulation and Joint Motion to Extend Proceeding Schedule, the parties state as follows:

I. ARGUMENT

The Board has the discretion to extend the schedule for opposition and cancellation proceedings pursuant to 37 C.F.R. § 2.116 and Fed. R. Civ. P. 6(b) provided there is good cause to extend the time. Registrant has requested the deposition of the Petitioner State of Michigan's designee pursuant to Fed. R. Civ. P. 30(b)(6). Petitioner's designee is unavailable to be deposed until September 30, 2016, the date on which expert disclosures are due in this proceeding and thirty (30) days prior to the close of discovery. To resolve this issue, the parties have stipulated to an extension of time of thirty-six (36) days for all outstanding dates so that Registrant may have

additional time for expert disclosures and discovery subsequent to the deposition of Petitioner's designee.

The parties hereby respectfully request that the Board extend the Proceeding Schedule in the following manner:

Expert Disclosures Due:	11/05/2016
Discovery Closes:	12/05/2016
Plaintiff's Pretrial Disclosures:	01/19/2017
Plaintiff's 30-day Trial Period Ends:	03/04/2017
Defendant's Pretrial Disclosures Due:	03/20/2017
Defendant's 30-day Trial Period Ends:	05/04/2017
Plaintiff's Rebuttal Disclosures Due:	05/19/2017
Plaintiff's 15-day Rebuttal Period Ends:	06/18/2017

II. CONCLUSION

For the foregoing reasons, the parties respectfully request that the Board extend these proceedings for a period of thirty-six (36) days consistent with the above modified schedule.

/s/ JAD

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