

ESTTA Tracking number: **ESTTA682723**

Filing date: **07/09/2015**

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

Proceeding.	92060029
Applicant	Plaintiff Jahn & Associates
Other Party	Defendant Melvin N.A. Avanzado DBA The Avanzado Law Firm
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Plaintiff's Trial Period is currently set to close on 09/20/2015. Jahn & Associates requests that such date be extended for 30 days, or until 10/20/2015, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	CLOSED
Discovery Closes :	CLOSED
Plaintiff's Pretrial Disclosures :	09/05/2015
Plaintiff's 30-day Trial Period Ends :	10/20/2015
Defendant's Pretrial Disclosures :	11/04/2015
Defendant's 30-day Trial Period Ends :	12/19/2015
Plaintiff's Rebuttal Disclosures :	01/03/2016
Plaintiff's 15-day Rebuttal Period Ends :	02/02/2016

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Jahn & Associates has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Jahn & Associates has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,  
/kmj/

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07/09/2015