

ESTTA Tracking number: **ESTTA674172**

Filing date: **05/26/2015**

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

Proceeding	92060050
Party	Plaintiff Cellco Partnership d/b/a Verizon Wireless
Correspondence Address	PAUL J REILLY BAKER BOTTS LLP 30 ROCKEFELLER PLAZA, 44TH FLOOR NEW YORK, NY 10112-4498 UNITED STATES paul.reilly@bakerbotts.com, lauren.emerson@bakerbotts.com, julie.albert@bakerbotts.com, nytmdpt@bakerbotts.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Lauren Beth Emerson
Filer's e-mail	nytmdpt@bakerbotts.com, lauren.emerson@bakerbotts.com
Signature	/lbe/
Date	05/26/2015
Attachments	Motion to Extend 526.pdf(97061 bytes )

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

In the Matter of Trademark Reg. No. 3,023,143  
Mark : WORLD CUP STREET LUGE  
Registrant : Ross Symons  
Issued : December 6, 2005

In the Matter of Trademark Reg. No. 3,026,975  
Mark : STREET LUGE  
Registrant : Ross Gordon Symons  
Issued : December 13, 2005

-----X  
CELLCO PARTNERSHIP d/b/a VERIZON :  
WIRELESS, :  
Petitioner, : Cancellation No. 92060050  
v. :  
ROSS SYMONS :  
Respondent. :  
-----X

**MOTION ON CONSENT TO EXTEND ALL DATES BY 30 DAYS**

Petitioner, Cellco Partnership d/b/a Verizon Wireless (“Opposer”), by its undersigned counsel, hereby respectfully moves to extend all discovery and trial dates in the above-referenced proceeding for thirty (30) days. Respondent consented to this extension by email dated May 22, 2015.

This motion is made in good faith and without any intention of causing a delay in this proceeding. Settlement discussions are ongoing between the parties. While the parties remain committed to trying to resolve this matter, if settlement cannot be achieved, additional time will also be required to pursue discovery and prepare for trial.

Wherefore, for the reasons stated and the good cause shown herein, Petitioner, by its counsel, respectfully requests that all dates in the proceeding be extended by thirty (30) days and proceed in accordance with the following schedule:

Time to Answer : CLOSED  
Deadline for Discovery Conference : CLOSED  
Discovery Opens : CLOSED  
Initial Disclosures Due : 06/24/2015  
Expert Disclosures Due : 10/22/2015  
Discovery Period to Close : 11/21/2015  
Plaintiff Pretrial Disclosures : 01/05/2016  
Plaintiff's 30-day Trial Period Ends : 02/19/2016  
Defendant's Pretrial Disclosures : 03/05/2016  
Defendant's 30-day Trial Period ends : 04/19/2016  
Plaintiff's Rebuttal Disclosures : 05/04/2016  
Plaintiff's 15-day Rebuttal Period Ends : 06/03/2016

Respectfully submitted,

BAKER BOTTS, L.L.P.

Date: May 26, 2015

By:



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Paul J. Reilly  
Lauren Beth Emerson  
30 Rockefeller Plaza  
New York, NY 10112-4498  
Tel: (212) 408-2500  
Fax: (212) 408-2501

Attorneys for Opposer  
Cellco Partnership d/b/a Verizon Wireless

**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below a true and correct copy of the  
aforementioned document, “**MOTION ON CONSENT TO EXTEND ALL DATES BY 30  
DAYS,**” was served on Registrant by first class mail at its address of record and by email as  
follows:

ROSS SYMONS  
BIG ANT STUDIO  
71-75 CITY ROAD  
SOUTHBANK VICTORIA, 3006  
AUSTRALIA

Ross.Symons@bigant.com

Date: May 26, 2015

By:   
\_\_\_\_\_ Lauren Beth Emerson