

ESTTA Tracking number: **ESTTA714631**

Filing date: **12/15/2015**

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

Proceeding	92061743
Party	Plaintiff Conopco, Inc.
Correspondence Address	LINDSEY UTRATA BAKER & MCKENZIE LLP 452 FIFTH AVENUE NEW YORK, NY 10018 UNITED STATES Lisa.Rosaya@bakermckenzie.com, Lindsey.Utrata@bakermckenzie.com, NYC-Trademarks@bakermckenzie.com
Submission	Motion to Extend
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Filer's e-mail	lisa.rosaya@bakermckenzie.com, nyctrademarks@bakermckenzie.com, lindsey.ustrata@bakermckenzie.com
Signature	/lwr/
Date	12/15/2015
Attachments	Cancellation No. 92061743 against BE MORE - Motion to Extend.pdf(162429 bytes)

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

Conopco, Inc.)	
)	
Petitioner,)	
)	Registration No. 4425792
v.)	Mark: BE MORE
)	Cancellation No.: 92061743
The FRS Company)	
)	
Registrant.)	

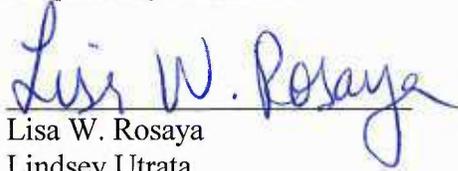
**MOTION TO EXTEND DISCOVERY AND TESTIMONY DATES IN CANCELLATION
PROCEEDING**

Pursuant to 37 C.F.R. § 2.120(a) and Rule 6(b), Fed.R.Civ.P., Petitioner, Conopco, Inc., by and through its undersigned attorneys, hereby respectfully requests that the Trademark Trial and Appeal Board (the "Board") extend all periods in the instant cancellation proceeding for a period of thirty (30) days such that the following new deadlines would be applicable:

Deadline for Discovery Conference :	01/13/2016
Discovery Opens :	01/13/2016
Initial Disclosures Due :	02/11/2016
Expert Disclosures Due :	06/10/2016
Discovery Period to Close :	07/10/2016
Plaintiff Pretrial Disclosures :	08/24/2016
Plaintiff's 30-day Trial Period Ends :	10/08/2016
Defendant's Pretrial Disclosures :	10/23/2016
Defendant's 30-day Trial Period ends :	12/07/2016
Plaintiff's Rebuttal Disclosures :	12/22/2016
Plaintiff's 15-day Rebuttal Period Ends :	01/21/2017

The parties are engaged in settlement negotiations. Jonathan Hyman, counsel for Registrant, consented to this Motion in an email dated December 14, 2015 to Petitioner's counsel. Therefore, Petitioner respectfully requests that this Motion be **GRANTED**.

Respectfully submitted,

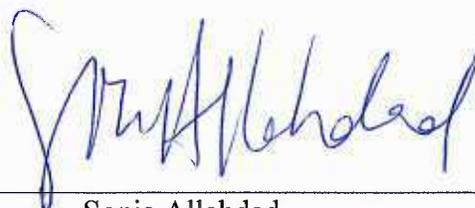
A handwritten signature in blue ink that reads "Lisa W. Rosaya". The signature is written in a cursive style and is positioned above a horizontal line.

Lisa W. Rosaya
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Attorneys for Petitioner

Date: December 15, 2015

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **MOTION TO EXTEND DISCOVERY AND TESTIMONY DATES IN CANCELLATION PROCEEDING** was served by email, upon consent, on counsel for Registrant, Jonathan Hyman, Knobbe Martens Olson & Bear LLP, 2040 Main Street, 14th Floor, Irvine, CA 92614 at Jonathan.Hyman@knobbe.com on this 15th day of December 2015.



Sonia Allahdad