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

Proceeding	92062380
Party	Plaintiff D.B.C. Corporation
Correspondence Address	CARLA C CALCAGNO CALCAGNO LAW 2101 L STREET NW, SUITE 400 WASHINGTON, DC 20037 UNITED STATES cccalcagno@gmail.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Carla C. Calcagno
Filer's e-mail	cccalcagno@gmail.com,trademarks@canopyparalegal.com
Signature	/Carla C. Calcagno/
Date	07/06/2016
Attachments	Petitioner Consented Motion to Extend by 45 days.pdf(26698 bytes)

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

D.B.C. Corporation,)	
)	
Petitioner)	
)	
v.)	Cancellation Nos.: 92062379
)	and 92062380
Nucita Venezolana C.A.,)	
)	
Defendant)	

**PETITIONER’S CONSENTED MOTION TO EXTEND
DISCOVERY BY FORTY-FIVE DAYS**

On June 13, 2016, pursuant to Rule 6 of the Federal Rules of Civil Procedure and the Trademark Rules of Practice, Petitioner moved the Board to suspend this case, and to extend discovery for forty-five days pending disposition of Petitioner’s Motion to Amend the Petitions for Cancellation and to Consolidate.

Petitioner contacted Respondent’s new counsel to determine whether it would consent to the Motions, and, if not, to the Motions to Suspend and/or Extend pending disposition of such motions. As noted therein, Petitioner was not able to obtain Respondent’s new counsel’s response to such motions.

Respondent has now advised that it does not consent to the Motion to Amend or Consolidated and does not consent to suspending the case pending disposition of the Motion to Amend and the Motion to Consolidate, but will consent to the request for a 45 day extension of the discovery period, commencing with expert disclosures.

Wherefore, Petitioner respectfully requests that the Board grant this Consented Motion to Extend and reset the close of discovery by 45 days, including the parties’ time to serve expert disclosures as follows:

Expert Disclosure Due : 07/26/2016
Discovery Closes : 08/25/2016
Plaintiff's Pretrial Disclosures : 10/09/2016
Plaintiff's 30-day Trial Period Ends : 11/23/2016
Defendant's Pretrial Disclosures : 12/08/2016
Defendant's 30-day Trial Period Ends : 1/22/2017
Plaintiff's Rebuttal Disclosures : 2/06/2017
Plaintiff's 15-day Rebuttal Period Ends : 03/08/2017

Dated July 6, 2016

Respectfully submitted,

By: /Carla C. Calcagno/
Carla C Calcagno, Esq.
Janet G Ricciuti, Esq.
Calcagno Law PLLC
2101 L Street, N.W.
Suite 400
Washington, D.C. 20037
Telephone: (202) 466-0544

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Trademark Rule 2.119(d), and the Agreement of the parties, a true copy of the foregoing:

PETITIONER'S CONSENTED MOTION TO EXTEND

was served this 6th day of July on Registrant's counsel of record by email to chris@sanchelima.com and paralegal@sanchelima.com

/Carla C. Calcagno/