

ESTTA Tracking number: **ESTTA15061**

Filing date: **09/14/2004**

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

| | |
|-----------------------------------|---|
| Proceeding | 91115231 |
| Party | Plaintiff SUN LIFE ASSURANCE COMPANY OF CANADA (U.S.) AND SUN LIFE ASSURANCE COMPANY OF CANADA |
| Correspondence Address | KRISTINA ROSETTE COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE, N.W. P.O. BOX 7566 WASHINGTON, DC 20044 |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Kristina Rosette |
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| Signature | /kristina rosette/ |
| Date | 09/14/2004 |
| Attachments | 09142004 ROYAL SUN Consented Motion to Reset.pdf (3 pages) |

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

In the matter of: Serial No. 75/340,833
Date of Filing: August 14, 1997
Mark: ROYAL SUN
Date of Publication: September 8, 1998

Sun Life Assurance Company of
Canada (U.S.) and Sun Life Assurance
Company of Canada,

Joint Opposers,

v.

Royal & SunAlliance USA, Inc.,

Applicant.

Opposition No. 91115231

Serial No. 75/340,833

**CONSENTED TO MOTION TO RESET
THE CLOSE OF DISCOVERY AND TRIAL DATES**

The parties hereby request a sixty (60)-day extension of the deadline to complete discovery and to correspondingly reset the trial dates. The current deadline to complete discovery is September 17, 2004, and therefore the extended deadline will be November 16, 2004. Accordingly, the discovery and testimony dates will be reset as follows:

| | |
|--|-------------------|
| THE PERIOD FOR DISCOVERY TO CLOSE: | November 16, 2004 |
| 30-day testimony period for party in position of plaintiff to close: | January 15, 2005 |
| 30-day testimony period for party in position of defendant to close: | March 16, 2005 |
| 15-day rebuttal testimony period for plaintiff to close: | April 15, 2005 |

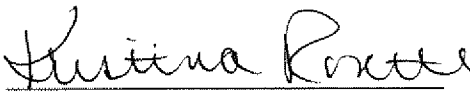
Counsel for the Applicant, Alexandra B. Stevens, Esq., has consented to this request via a September 14, 2004 telephone conference with the undersigned.

The parties request this extension of time because they are working toward settlement of the subject opposition. Applicant has reviewed the settlement agreement proposed by Joint Opposers. On September 9, 2004, Applicant's counsel provided Joint Opposers' counsel with comments on and requested revisions to the proposed agreement. Joint Opposers are currently in the process of reviewing Applicant's comments and requested revisions, and expect to respond soon.

This request is made in good faith and not for purposes of delay.

Respectfully submitted,

Date: September 14, 2004

By 


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Attorneys for Joint Opposers
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and Sun Life Assurance Company of Canada

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing CONSENTED TO MOTION TO
RESET THE CLOSE OF DISCOVERY AND TRIAL DATES was sent via facsimile and first
class mail, postage pre-paid on this 14th day of September 2004 to:

Mark D. Giarratana
McCarter & English LLP
185 Asylum Street
CityPlace 1
Hartford, CT 06103
Fax: (860) 724-3397



Kristina Rosette