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09-16-2002

U.S. Patent & TMOfc/TM Mail Rcpt Dt. #7C UNITED STATES PATENT AND TRADEMARK OFFICE  
THE TRADEMARK TRIAL AND APPEAL BOARD

BAUSCH & LOMB INCORPORATED

Opposer,

v.

Opposition No. 122,405  
122,633

P-COR, L.L.C.

Applicant.

**APPLICANT'S MOTION FOR EXTENSION OF TIME  
FOR APPLICANT TO RESPOND TO OPPOSER'S DISCOVERY REQUESTS**

P-Cor, L.L.C., through its attorney, hereby moves the Board for a thirty (30) extension of time, up to and including October 13, 2002, within which to serve its objections and responses to Opposer's First Set of Interrogatories and Requests for Production of Documents and Things.

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In support of this Motion, Applicants states the following:

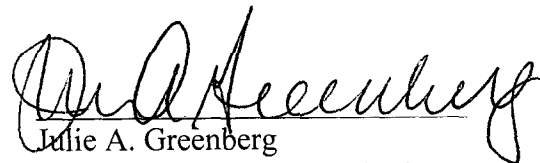
Both parties have been and continue to be in settlement negotiations. The Interrogatories and Document Requests are very broad, requiring extensive and detailed information, and a voluminous amount of documents. It is quite possible that settlement could be reached. Therefore much time and resources would be wasted unnecessarily for discovery that will not even be utilized

GIFFORD, KRASS, GROH, SPRINKLE, ANDERSON & CITKOWSKI, P.C. 280 N. OLD WOODWARD AVENUE, STE. 400, BIRMINGHAM, MICHIGAN 48009-5394 (248) 647-6000

Therefore, Applicant requests a thirty day extension in which to respond to the discovery requests in hopes that settlement may be reached by such time.

WHEREFORE, Applicant respectfully requests that its time to serve its objections and responses to the Interrogatories and Document Requests be enlarged up to and including October 13, 2002.

Respectfully submitted,



Julie A. Greenberg  
Gifford, Krass, Groh, Sprinkle,  
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(248)647-6000  
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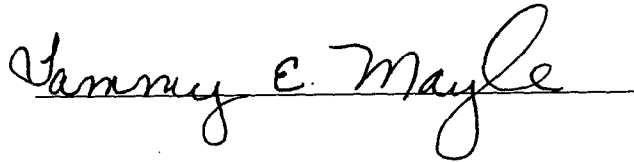
Dated: 9.12.02  
JAG/tem  
FOE-10271/03

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of **APPLICANT'S MOTION FOR EXTENSION OF TIME FOR APPLICANT TO RESPOND TO OPPOSER'S DISCOVERY REQUESTS** was deposited with the U.S. Postal Service in a first class, postage prepaid envelope addressed to:

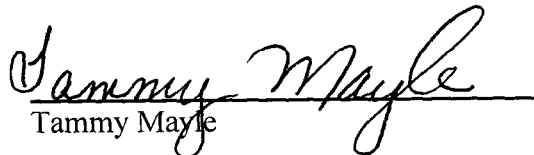
Richard Lehv  
Tamar Niv  
FROSS ZELNICK LEHRMAN & ZISSU, P.C.  
866 United Nations Plaza  
New York, NY 10017

on this 12 day of September, 2002.

  
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**CERTIFICATE OF MAILING**

I hereby certify that the foregoing **APPLICANT'S MOTION FOR EXTENSION OF TIME FOR APPLICANT TO RESPOND TO OPPOSER'S DISCOVERY REQUESTS** is being deposited with the United States Postal Service as first-class mail, postage, prepaid, in an envelope addressed to the Assistant Commissioner of Trademarks, 2900 Crystal Drive, Arlington, VA 22202, on this 12 day of September, 2002.

  
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