

07-03-2002

U.S. Patent & TMOte/TM Mail Rept Dt. #22 THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

TITAN INDUSTRIES LIMITED,

v.

Opposer,

MOVADO LLC,

Applicant.

Opposition No. 122x93

BOX TTAB - NO FEE

## MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES

Opposer moves, on consent, for a three-month extension of discovery and trial deadlines as follows:

PERIOD FOR DISCOVERY TO CLOSE:

November 7, 2002

30-day testimony period for party in position of plaintiff to close:

February 4, 2003

30-day testimony period for party in position of defendant to close:

April 3, 2003

15-day rebuttal testimony period for plaintiff to close:

May 17, 2003

This additional time is sought to permit the parties to explore the possibility of settlement.

Applicant's counsel, Tamar Niv Bessinger, Esq., has consented to this request.

This request is submitted in triplicate in accordance with 37 C.F.R. § 2.121(d).

Respectfully submitted,

LADAS & PARRY Attorneys for Opposer Titan Industries Limited

Dated: July 1, 2002

By:

Robert Alpert
Joseph J. Villapol
Teresa Segalman
26 West 61st Street
New York, NY 10023
(212) 708-1860
(Our File: 010138)

## CERTIFICATE OF SERVICE

I, Sonja Huang, certify that a copy of the foregoing MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES was served on the person(s) listed below by first class mail, postage prepaid, on July 1, 2002:

Tamar Niv Bessinger, Esq. Fross Zelnick Lehrman & Zissu, P.C. 866 United Nations Plaza New York, NY 10017

I, Sonja Huang, certify that the foregoing MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES was deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Trademarks, BOX TTAB - NO FEE, 2900 Crystal Drive, Arlington, VA 22202-3513, on July 1, 2002:

CERTIFICATE OF MAILING