

ESTTA Tracking number: **ESTTA90498**

Filing date: **07/18/2006**

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

Proceeding	91166203
Party	Plaintiff Drive Financial Services LP  Drive Financial Services LP 8585 N. Stemmons Frwy Suite 1100-North Dallas, TX 75247 UNITED STATES
Correspondence Address	JOHN F. MARTIN GRUBER HURST JOHANSEN & HAIL LLP 1445 ROSS AVENUE SUITE 4800 DALLAS, TX 75202 UNITED STATES bgoldner@skadden.com, smarquez@skadden.com, bbrillhart@drivefinancial.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	John F. Martin
Filer's e-mail	jmartin@ghjhlaw.com
Signature	/s/ John F. Martin
Date	07/18/2006
Attachments	Motion for Extension of Discovery with Consent 7-18-2006.pdf ( 2 pages )(40854 bytes )

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

DRIVE FINANCIAL SERVICES, LP,	§	Serial No. 78/324,239
	§	
<b>Opposer,</b>	§	
	§	
v.	§	<b>Opposition No. 91166203</b>
	§	
CITICORP,	§	<b>Mark: DRIVER'S EDGE (intent to-use)</b>
	§	
<b>Applicant.</b>	§	<b>Int'l Class(es): 35, 36, 37, 41</b>

**Motion for an Extension of Discovery and Trial Periods With Consent**

Drive Financial Services, LP (“Drive”) requests that the Close of Discovery be extended until 10/06/2006, and that all subsequent dates be reset accordingly. The grounds for this request are as follows:

- Parties are engaged in ongoing discovery.

Drive has secured the express consent of all other parties to this proceeding for the extension requested herein. Drive has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Dated: Dallas, Texas  
July 18, 2006

By: 

**G. Michael Gruber**  
[mgruber@ghjhlaw.com](mailto:mgruber@ghjhlaw.com)  
Texas State Bar No. 08555400  
**John F. Martin**  
[jmartin@ghjhlaw.com](mailto:jmartin@ghjhlaw.com)  
Texas State Bar No. 24002530  
**Michael J. Lang**  
[mlang@ghjhlaw.com](mailto:mlang@ghjhlaw.com)  
Texas State Bar No. 24036944

**GRUBER HURST JOHANSEN & HAIL LLP**  
Fountain Place  
1445 Ross Avenue, Suite 4800  
Dallas, Texas 75202  
(214) 855-6800  
(214) 855-6808 – fax

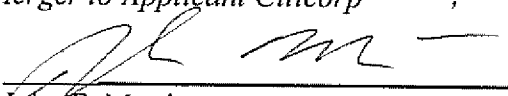
Attorneys for Drive Financial Services, LP

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing pleading has been forwarded in accordance with TBMP Rule 113 and 37 C.F.R. § 2.119 to all counsel of record on the 18 day of July, 2006:

Bruce J. Goldner, Esq.  
[bgoldner@skadden.com](mailto:bgoldner@skadden.com)  
Stephanie J. Kamerow, Esq.  
[skamerow@skadden.com](mailto:skamerow@skadden.com)  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, New York 10036

*Counsel for Citigroup, Inc.*  
*Successor by Merger to Applicant Citicorp*

  
\_\_\_\_\_  
John F. Martin  
Michael J. Lang