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Filing date: **08/25/2008**

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

Proceeding	91168630
Party	Plaintiff GOVERNMENT EMPLOYEES INSURANCE COMPANY
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Submission	Stipulated/Consent Motion to Extend
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Date	08/25/2008
Attachments	motion.pdf (4 pages)(119341 bytes)

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

In the matter of U.S. Application Serial No. 78/517,453

GOVERNMENT EMPLOYEES)	
INSURANCE COMPANY,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91168630
)	
)	
GECKO TRADING COMPANY, INC.,)	
Applicant.)	

STIPULATED MOTION TO RESET DISCOVERY AND TESTIMONY PERIODS

In accordance with the provisions of TBMP § 509, Opposer, Government Employees Insurance Company, through the undersigned attorneys, respectfully requests that the discovery and testimony period deadlines in the above-referenced Opposition, be extended and reset for sixty (60) days. With such a sixty (60) day extension, the discovery and testimony periods would be reset as follows:

Discovery Period to Close:	October 25, 2008
Plaintiff's 30-day Testimony Period Closes:	January 23, 2009
Defendant's 30-day Testimony Period Closes:	March 24, 2009
Plaintiff's 15-day Rebuttal Period Closes:	May 8, 2009

In the Board's May 14, 2008 Order, the Board stated that any further requests for extensions of time must include a report about the progress made by the parties with respect to discovery and with respect to any ongoing settlement discussions. In accordance with this request, and as set forth below, the parties submit that this extension is necessary in order to complete discovery, as well as to explore the possibility of settlement.

Since the commencement of this proceeding, each party has served initial discovery requests on the other and has provided responses thereto. Recently, Opposer served on Applicant a second set of interrogatories, documents requests and requests for admission. Responses to these subsequent requests are not due until after the current discovery deadline. In addition, Opposer recently produced supplemental documents responsive to Applicant's discovery requests and served notices for discovery depositions. These discovery depositions are currently scheduled for mid-September 2008. Similarly, the parties are working to find mutually convenient dates for Applicant to depose Opposer. Finally, the parties have begun some discussion regarding possible settlement of this matter.

To allow ample time to respond to and review additional discovery, and to complete the discovery depositions, the parties respectfully request that the Board grant this motion. The parties have been making steady progress with respect to the completion of discovery and expect that they will be able to conclude the discovery process within the newly-requested 60-day extension.

Counsel for Applicant, Bruce Brunda, agreed to this extension in a telephone call to the undersigned, on August 18, 2008.

Dated: August 22, 2008

Respectfully submitted,

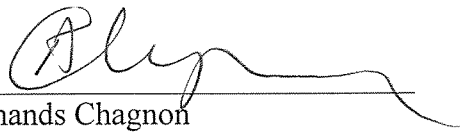


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CERTIFICATE OF SERVICE

This is to certify that on the 25th day of August 2008, a true and correct copy of the foregoing STIPULATED MOTION TO RESET DISCOVERY AND TESTIMONY PERIODS was served by first class mail, postage prepaid, upon:

Bruce Brunda, Esq.
Stetina Brunda Garred & Brucker
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Aliso Viejo, CA 92656


Armands Chagnon