

ESTTA Tracking number: **ESTTA105014**

Filing date: **10/18/2006**

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

Proceeding	91170198
Party	Defendant Danucom Corp. Danucom Corp. 490 Crawford Street Eatontown, NJ 07724
Correspondence Address	Stephen L. Humphrey Cameron & Hornbostel LLP Suite 700 818 Connecticut Avenue, NW Washington, DC 20006
Submission	Motion to Extend
Filer's Name	Stephen L. Humphrey
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Date	10/18/2006
Attachments	Second Motion for Extension of Time.pdf (3 pages)(204992 bytes)

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

Commontime, Limited,)	
)	
Opposer,)	Opposition No. 91170198
v.)	Mark: MFORMS
)	
Danucom Corp.,)	Serial No. 78541141
)	
Applicant.)	
)	

**Applicant’s Motion for Extension of Time to Respond to Opposer’s
First Set of Interrogatories and First Set of Requests for Production of
Documents and Things, and for an Extension of the Close of Discovery**

Applicant, Danucom, Inc., pursuant to 37 C.F.R. §2.120(a) hereby moves the Board to extend the time for it to respond to Opposer’s First Set of Interrogatories and First Set of Requests for Production of Documents and Things to and including November 8, 2006, and in support thereof states as follows:

1. On motion of Applicant the Board reset the discovery and trial dates in this proceeding on September 19, 2006; as reset the period for discovery to close is December 22, 2006. In that same Order the Board extended to October 3, 2006 the time for Applicant to respond to Opposer’s first set of interrogatories and first set of document requests.
2. Thereafter the parties discussed settlement terms and on October 3, 2006 the attorney for Opposer consented in writing to a further extension of the time for Applicant to respond to Opposer’s written discovery to October 18, 2006. Thereafter, at the request of Opposer, Applicant prepared and

presented a draft settlement agreement to Opposer in accordance with their discussions and Opposer responded with written comments and proposed changes. The parties are working toward an agreement to resolve their differences. In order to avoid unnecessary costs during settlement negotiations, Applicant requests an additional extension of time for it to respond to Opposer's written discovery. This motion is being submitted prior to the expiration of the time allowed for Applicant to respond to Opposer's first set of interrogatories and first set of document requests, as extended by the Board's Order of September 19, 2006 and later by agreement of the parties with the written consent of Opposer's attorney on October 3, 2006.

For the reasons stated above, Applicant requests that the Board extend the time for it to respond to Opposer's interrogatories and document requests by 21 days or until November 8, 2006. Applicant further requests that the Board extend the date for the Close of Discovery by 45 days that is, until February 4, 200~~7~~⁷, and reset trial dates accordingly.

Respectfully submitted,


Stephen L. Humphrey

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Counsel for Applicant,
DANUCOM CORP.

October 18, 2006
Washington, DC

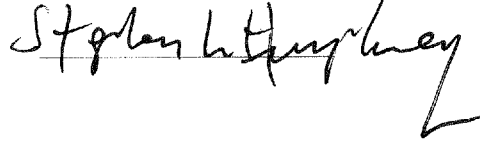
Certificate of Mailing

I hereby certify that this Motion is being sent to the TTAB via the Electronic System for Trademark Trials and Appeals on October 18, 2006.

Name of Person Signing this Certificate:

Stephen L. Humphrey

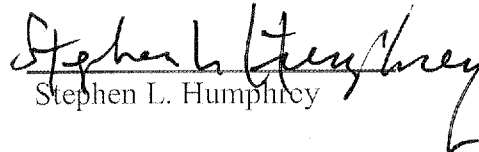
Signature of Person Signing this Certificate:



Date of Signing: October 18, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October, 2006, I placed in the mail, First Class postage prepaid, a true and correct copy of the foregoing **Applicant's Motion for Extension of Time to Respond to Opposer's First Set of Interrogatories and First Set of Requests for Production of Documents and Things, and for an Extension of Discovery**, addressed to the attorney of record for Opposer, Gene A. Tabachnick, Esq. Reed Smith LLP, 435 Sixth Avenue, Pittsburgh, PA 15219-1886.



Stephen L. Humphrey