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Filing date: **04/16/2007**

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

Proceeding	91171182
Party	Defendant Game Show Network, LLC Game Show Network, LLC 2150 Colorado Avenue Santa Monica, CA 90404 francie.gorowitz@kattenlaw.com
Correspondence Address	Francie R. Gorowitz Katten Muchin Rosenman LLP 2029 Century Park East, Suite 2600 Los Angeles, CA 90067 UNITED STATES francie.gorowitz@kattenlaw.com
Submission	Motion to Extend
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Date	04/16/2007
Attachments	GSN - Motion for Extension of Time to Respond to Discovery Requests.pdf (5 pages)(190990 bytes) GSN - Declaration of Francie R Gorowitz -4-16-07.pdf (3 pages)(122518 bytes)

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

Harrah's Licensing Company, LLC,)	Opp. No. 91171182
)	91171183
)	91171184
Petitioner/ Opposer)	Canc. No. 92046243
)	
vs.)	
)	
Game Show Network, LLC)	
)	
Respondent/Applicant)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO
DISCOVERY REQUESTS**

Respondent/Applicant, Game Show Network, LLC (GSN), a limited liability company organized under the laws of the State of Delaware, located at 2150 Colorado Avenue, Santa Monica, California, 90404 hereby moves for a sixty-day extension of time to respond to Harrah's outstanding discovery requests.

As established by the Declaration of Francie R. Gorowitz, and discussed, below, there is good cause for the Board to grant the extension requested.

I. BACKGROUND

There is an on-going discovery dispute in this matter, resulting from Harrah's failure to properly respond to GSN's discovery requests. ^{1/} Gorowitz Declaration, Paragraph 2. After

1/ GSN's discovery requests were served on Harrah's on November 14, 2006. Harrah's was unconditionally granted two 30-day extensions of time to respond. Harrah's purported responses, which were served on

unsuccessfully trying to resolve this dispute, on April 4, 2007 GSN moved for sanctions or in the alternative to compel responses to discovery. Proceedings are currently suspended pending the Board's decision on said motion. Gorowitz Declaration, Paragraph 6.

On March 12, 2007, during the course of the dispute over Harrah's responses, Harrah's served its first sets of discovery requests on GSN, which consisted of 12 interrogatories, 31 requests for production, and 27 requests for admission. Gorowitz Declaration, Paragraph 7. Responses were due on April 16, 2007 (three weeks after the scheduled close of the discovery period on March 25, 2007). Gorowitz Declaration, Paragraph 8.

Additional time is needed to allow GSN to complete its review of its documents so that it can properly respond to the outstanding discovery requests. Gorowitz Declaration, Paragraph 9. On April 13, 2007, GSN requested an extension of time to provide responses to Harrah's first set of discovery. Gorowitz Declaration, Paragraph 10.

Although Harrah's was granted two 30-day extensions to respond to GSN's discovery requests, Harrah's refused to grant an extension to GSN, unless GSN agreed to stipulate to a bilateral extension of the discovery period and to the protective order drafted by Harrah's.^{2/} There is no good cause to attach conditions to GSN's reasonable request, especially where GSN earlier granted Harrah's two unconditional extensions of its own.

February 16, 2007, the last day of the extended period, were not substantively responsive. Gorowitz Declaration, Paragraphs 3 and 4.

2/ Harrah's April 16, 2007 email stated: "Harrah's will stipulate to extend the deadline for Game Show Network's discovery responses for thirty (30) days but only if: (1) Game Show Network stipulates to Harrah's pending motion for a sixty (60) day bilateral extension of the discovery period and (2) Game Show Network stipulates to the protective order provided to you by Dave Stewart on March 28, 2007." Gorowitz Declaration, Paragraph 11 and Exhibit 2 thereto.

This extension is required so that GSN can properly respond to Harrah's requests, which should avoid further discovery disputes between the parties.

II. ARGUMENT

The Board, in its discretion, may enlarge the period of time required to respond to outstanding discovery requests. See: Federal Rule of Civil Procedure 6(b). The applicable standard for granting a motion to extend before the expiration of the period as originally set or previously extended, is a showing of good cause. See: TMBP § 509.01. This Motion is being filed prior to the expiration of time for responding to Harrah's discovery requests and thus, the standard for granting the motion is a showing of goods cause.

GSN is in the process of reviewing its records so that it can respond to the requests. Additional time is needed to complete the review and permit GSN to properly respond.

Harrah's own actions in failing to properly respond to GSN's discovery requests contributed to GSN's inability to respond within the initial thirty day response period, as GSN's counsel had to spend extensive amounts trying to resolve the discovery dispute and then moving the Board for resolution.

As proceedings are currently suspended, the additional sixty-day period will not prejudice Harrah's in preparing its case.

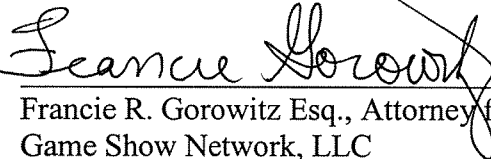
Good cause being shown, it is respectfully requested that the Board grant this motion and

extend the deadline for Game Show Network LLC to respond to Harrah's outstanding discovery requests until June 15, 2007.

Dated: April 16, 2007

Respectfully submitted,

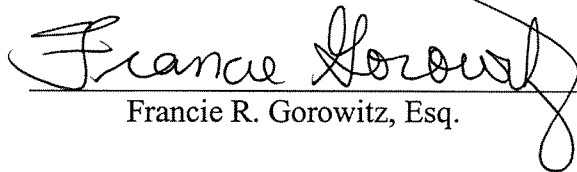
KATTEN MUCHIN ROSENMAN LLP

By: 
Francie R. Gorowitz Esq., Attorney for
Game Show Network, LLC

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2029 Century Park East
Suite 2600
Los Angeles, California 90067
(310) 788-4495

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing, MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS and the supporting DECLARATION OF FRANCIE R. GOROWITZ were served on Petitioner/Opposer by depositing them with the United States Postal Service as first class mail in an envelope addressed to Petitioner/Opposer's Attorney, Pamela K. Lina, Esq., Alston & Bird LLP, 1201 West Peachtree Street, Atlanta, Georgia 30309 on April 16, 2007.


Francie R. Gorowitz, Esq.

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**DECLARATION OF FRANCIE R. GOROWITZ IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS**

I, Francie R. Gorowitz, declare as follows:

1. I am a Partner of the law firm of Katten Muchin Rosenman LLP, counsel for Game Show Network, LLC (GSN) in these proceedings. I am the attorney primarily responsible for this proceeding.
2. There is an on-going discovery dispute between the parties that is the result of Harrah's failure to properly respond to GSN's discovery requests.
3. GSN served its first set of discovery requests on November 14, 2006. Ms. Lina called me on or about December 19, 2006 and January 18, 2007 requesting thirty-day extensions. Both of these extensions were granted unconditionally.
4. Harrah's responses, which were served on February 16, 2007, the day before the last day of the second extension, were not substantively responsive.

5. After unsuccessfully trying to resolve this dispute, on April 4, 2007 GSN moved for sanctions or in the alternative to compel responses to discovery. Both GSN's good faith attempt to resolve the dispute and GSN's need to prepare and file a motion for sanctions/to compel required the expenditure of extensive amounts of time.

6. Proceedings are currently suspended pending the Board's decision on said motion.

7. On March 12, 2007, Harrah's served its first sets of discovery requests on GSN, which consisted of 12 interrogatories, 31 requests for production, and 27 requests for admission.

8. Responses were due on April 16, 2007 (three weeks after the scheduled close of the discovery period on March 25, 2007).

9. GSN is currently reviewing its records so that it can appropriately respond to the outstanding discovery requests. Additional time is required to complete the review.

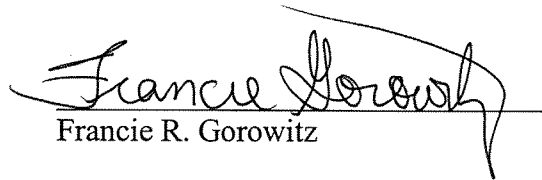
10. On April 13, 2007, I left a message for Pamela Lina, counsel for Harrah's, requesting a thirty-day extension of time to respond to Harrah's discovery requests. I confirmed this message by email. A copy of my April 13, 2007 email to Pamela Lina is attached hereto as Exhibit 1.

11. In Ms. Lina's response today, I was advised that Harrah's will only stipulate to the extension if GSN stipulates to a bilateral extension of the discovery period and signs the Protective Order proposed by Harrah's on March 28, 2007 (Harrah's rejected the executed Protective Order provided by GSN on March 8, 2007, which was in the form sanctioned by the Board). A copy of Ms. Lina's April 16, 2007 email is attached hereto as Exhibit 2.

12. Since Harrah's served its discovery requests less than two weeks before the close of discovery, Harrah's is not entitled to follow-up discovery. Further, since proceedings are currently suspended, the additional sixty-days requested by GSN will not affect Harrah's preparation for trial.

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of GSN's applications and registration, declares that all statements made of her own knowledge are true; and all statements made on information and belief are believed to be true.

Date: April 16, 2007


Francie R. Gorowitz