

ESTTA Tracking number: **ESTTA237964**

Filing date: **09/19/2008**

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

Proceeding	91182896
Party	Plaintiff The Port Authority of New York and New Jersey
Correspondence Address	Keith Medansky DLA Piper US LLP P.O. Box 64807 Chicago, IL 60664-0807 UNITED STATES ch.tm@dlapiper.com, keith.medansky@dlapiper.com, nicole.chaudhari@dlapiper.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Nicole Chaudhari
Filer's e-mail	ch.tm@dlapiper.com, nicole.chaudhari@dlapiper.com, keith.medansky@dlapiper.com
Signature	/Nicole Chaudhari/
Date	09/19/2008
Attachments	Stipulated Request-91182896.pdf (6 pages)(671419 bytes)

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

In re Serial No. 77/023,709
Mark: FREEDOM TOWER

THE PORT AUTHORITY OF NEW YORK)	
AND NEW JERSEY,)	
)	
Opposer,)	
)	Opposition No. 91/182,896
v.)	
)	Mark: FREEDOM TOWER
TORSTEN BLUEHER,)	
)	
Applicant.)	

STIPULATED REQUEST FOR EXTENSION OF TIME

Opposer, by its attorneys, hereby requests that the time for exchanging initial disclosures be extended up to and including October 3, 2008, with the remaining dates extended as follows:

Initial Disclosures Due	10/3/2008
Expert Disclosures Due	01/31/2009
Discovery Period to Close	03/2/2009
Plaintiff's Pretrial Disclosures	04/16/2009
Plaintiff's 30-Day Trial Period Ends	05/31/2009
Defendant's Pretrial Disclosures	06/15/2009
Defendant's 30-Day Trial Period Ends	07/30/2009
Plaintiff's Rebuttal Disclosures	08/14/2009
Plaintiff's 15-Day Rebuttal Period Ends	09/13/2009

The grounds for this request are as follows: both parties need more time to prepare initial disclosures. Opposer has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

The Board should note that there is a motion pending to consolidate this proceeding with Opposition Nos. 91/184,565 and 91/184,253 (see Applicant's Motion for Consolidation of Proceedings with Opposer's Consent, filed August 28, 2008). The Board should further note that the parties had agreed to extend the time for exchanging initial disclosures for all three proceedings up to and including September 19, 2008.

Dated: September 19, 2008

Respectfully submitted,

**THE PORT AUTHORITY OF NEW YORK
AND NEW JERSEY**

By: Nicole Chaudhari

Keith W. Medansky

Gina Durham

Nicole A. Chaudhari

DLA PIPER US LLP

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Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a copy of this correspondence is being deposited with the United States Postal Service as First-Class Mail in an envelope addressed to Gary D. Krugman, Sughrue Mion, PLLC, 2100 Pennsylvania Avenue, N.W., Suite 800, Washington, D.C. 20037-3123, on September 19, 2008.

Nicole Chaudhari

Signature

Nicole Chaudhari

Name

9-19-08

Date of Signature

ESTTA Tracking number: **ESTTA233439**

Filing date: **08/28/2008**

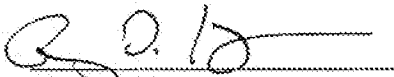
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91182896
Party	Defendant Blueher, Torsten
Correspondence Address	GARY D. KRUGMAN SUGHRUE MION, PLLC 2100 PENNSYLVANIA AVE NW STE 800 WASHINGTON, DC 20037-3213 UNITED STATES tm@sughrue.com
Submission	Motion to Consolidate
Filer's Name	Gary D. Krugman
Filer's e-mail	gkrugman@sughrue.com, mperry@sughrue.com, tm@sughrue.com
Signature	/Gary D. Krugman/
Date	08/28/2008
Attachments	201229 Motion to Consolidate.pdf (3 pages)(60718 bytes)

remaining due dates and deadlines as set forth in the Board's June 11, 2008 institution letter and trial order in Opposition No. 91/184,565.

Respectfully submitted,

TORSTEN BLUEHER

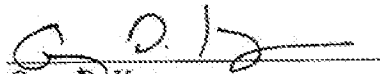

By: Gary D. Krugman
Attorney for Applicant
SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, NW
Washington, DC 20037
Tel: (202) 663-7484

Date: August 28, 2008

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **APPLICANT'S MOTION FOR CONSOLIDATION OF PROCEEDINGS WITH OPPOSER'S CONSENT** has been mailed this 28th day of August 2008, by first-class mail, postage prepaid to:

Keith W. Medansky
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Gary D. Krugman

cc: Wolfgang Strasser