

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

Proceeding	91188035
Applicant	Defendant Advance Watch Company Ltd.
Other Party	Plaintiff Guess? IP Holder L.P. and Guess?, Inc.

**Motion for an Extension of Answer or Discovery or Trial Periods With Consent**

The Close of Plaintiff's Trial Period is currently set to close on 10/31/2011. Advance Watch Company Ltd. requests that such date be extended for 30 days, or until 11/30/2011, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	CLOSED
Discovery Closes :	CLOSED
Plaintiff's Pretrial Disclosures :	10/16/2011
Plaintiff's 30-day Trial Period Ends :	11/30/2011
Defendant's Pretrial Disclosures :	12/15/2011
Defendant's 30-day Trial Period Ends :	01/29/2012
Plaintiff's Rebuttal Disclosures :	02/13/2012
Plaintiff's 15-day Rebuttal Period Ends :	03/14/2012

The grounds for this request are as follows:

- Parties are engaged in settlement discussions Applicant, Advance Watch Company Ltd. (Applicant; or Advance Watch;), and Opposers, Guess? IP Holder L.P. and Guess?, Inc. (collectively referred to herein as Opposers;), by their respective counsel, submit this stipulated motion seeking a 30-day extension of 1) Applicant's August 16, 2011 deadline to supplement discovery responses, pursuant to the July 19, 2011 Board Order, and 2) all remaining trial deadlines, also set forth in the July 19, 2011 Board Order.

Therefore, the proposed deadline for Applicant to supplement discovery responses is September 15, 2011. The parties propose extension of all remaining trial deadlines for another 30 days.

In support for this motion, the parties state that this request is made for good cause and is not for purposes of delay. The parties have jointly agreed to request an extension as the parties discuss possible settlement.

Pursuant to TBMP Section 605.02, and the Board's August 12, 2011 Order, the following is a summary of the progress of the parties' negotiations, so as to show continued good cause for the extension sought:

The parties have exchanged proposed settlement terms. The most recent revisions to these terms were provided to Opposers&#146; counsel on August 4, 2011.

Opposers&#146; counsel, Steven Lauridsen, consented to this amended motion via e-mail on August 12, 2011.

Advance Watch Company Ltd. has secured the express consent of all parties to this proceeding for the extension and resetting of dates requested herein.

Advance Watch Company Ltd. 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.

#### **Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by First Class Mail on this date.

Respectfully submitted,

/hope v shovein/

Hope V. Shovein

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