

ESTTA Tracking number: **ESTTA395416**

Filing date: **02/28/2011**

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

Proceeding	91190326
Party	Plaintiff TeleTracking Technologies, Inc.
Correspondence Address	STANLEY D. FERENCE III FERENCE & ASSOCIATES LLC 409 BROAD STREET PITTSBURGH, PA 15143 UNITED STATES bmalkin@ferencelaw.com,uspto@ferencelaw.com
Submission	Other Motions/Papers
Filer's Name	Stanley D. Ference III
Filer's e-mail	uspto@ferencelaw.com, Mike.Smith@Steptoe-Johnson.com
Signature	/Stanley D. Ference III/
Date	02/28/2011
Attachments	Motion to Reset Discovery and Trial Dates (2-28-11).pdf (4 pages)(62313 bytes)

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

In the matter of trademark application Serial No. 77/561,677

For the mark **IDTRAC**

Published in the Official Gazette on January 20, 2009

TeleTracking Technologies, Inc.,)	
)	Opposition No. 91190326
Opposer,)	
)	
vs.)	
)	
SecurLinx Holding Corporation,)	
)	
)	
Applicant.)	
_____)	

MOTION TO RE-SET DISCOVERY AND TRIAL DATES

Opposer, TeleTracking., hereby moves to re-set the Discovery and Trial Dates as

Follows:

	<u>Current Date</u>	<u>Proposed Date</u>
THE PERIOD FOR DISCOVERY TO CLOSE:	CLOSED	04/07/2011
Plaintiff's Pretrial Disclosures:	CLOSED	05/22/2011
Plaintiff's 30-day Trial Period Ends:	CLOSED	07/06/2011
Defendants' Pretrial Disclosures:	CLOSED	07/21/2011
Defendant's 30-day Trial Period Ends:	04/06/2011	09/04/2011

Plaintiff's Rebuttal Disclosures: 04/21/2011 **09/19/2011**

Plaintiff's 15-day Rebuttal Period Ends: 05/21/2011 **10/19/2011**

Briefs shall be Due as Follows:

Plaintiff's Brief **12/18/2011**

Defendant's Brief **1/17/2012**

Reply Brief **2/1/2012**

This Motion is filed after the expiration of the current time period for discovery and good cause exists therefore. The parties are in earnest negotiations to settle this matter and have exchanged multiple drafts of settlement documents. All counsel discussed the current state of discovery and are in agreement that it is beneficial for the parties to extend the discovery time out as it will aid in the efficient settlement of the case. Opposer has consent for the requested motion from the Applicant, through its counsel.

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Accordingly, it is respectfully requested that the Board grant this Motion and re-set the Trial Dates as set forth above.

Respectfully Submitted,

FERENCE & ASSOCIATES LLC

Dated: February 27, 2011

By: /s/ Stanley D. Ference III

Stanley D. Ference III

Registration No. 33,879

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, PA 15143

(412) 741-8400

(412) 741-9292 – Facsimile

Attorneys for Opposer

CERTIFICATE OF TRANSMISSION AND SERVICE

I certify the foregoing **MOTION TO RE-SET DISCOVERY AND TRIAL DATES** is
being electronically filed with:

Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, Virginia 22313-1451

and is being served by first class mail, postage pre-paid, upon:

Michael T. Smith, Esq.
Steptoe & Johnson PLLC
PO Box 2190
Clarksburg, WV 26302

Attorneys for the Applicant

this 28th day of February, 2011.

/s/ Stanley D. Ference III
Stanley D. Ference III