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Filing date: **09/18/2009**

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

Proceeding	91190954
Party	Defendant Heritage New York, IPA
Correspondence Address	THOMAS M. ROSSELLI CARTER, DELUCA, FARRELL & SCHMIDT, LLP 445 BROADHOLLOW RD STE 225 MELVILLE, NY 11747-3615 UNITED STATES docket@cdfslaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Jeffrey S. Steen
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Signature	/Jeffrey Steen/
Date	09/18/2009
Attachments	00034577.PDF (3 pages)(97507 bytes)

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

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Healthcare Partners Affiliates :
Medical Group :
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 :
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 Opposer, :
 :
 vs. :
 :
 Heritage New York, IPA :
 :
 Applicant. :
-----X
Opposition No. 91190954
U.S. Appln. Serial No. 77/064,371
Mark: HEALTHCARE PARTNERS
MANAGEMENT SERVICES
ORGANIZATION

SECOND STIPULATED MOTION TO EXTEND TIME FOR APPLICANT
TO ANSWER THE NOTICE OF OPPOSITION, DISCOVERY
AND TRIAL DATES

By the Trademark Trial and Appeal Board ("TTAB") order mailed August 17, 2009, granting applicants stipulated motion to extend, a schedule was set by the TTAB wherein, *inter alia*, applicant's answer is due September 21, 2009.

Applicant, Heritage New York, IPA, through its undersigned counsel, hereby moves, with consent of the Opposer, to extend the time to answer the Notice of Opposition, to extend the discovery and trial dates in the above-captioned proceeding as follows:

Applicant's Answer Due	October 21, 2009
Deadline for Discovery Conference	November 20, 2009
Discovery Opens	November 20, 2009
Initial Disclosures Due	December 20, 2009
Expert Disclosures Due	April 19, 2010

Discovery Closes:	May 19, 2010
Plaintiff's Pretrial Disclosures	July 2, 2010
Plaintiff's 30-day Trial Period Ends	August 17, 2010
Defendant's Pretrial Disclosure	September 1, 2010
Defendant's 30-day Trial Period Ends	October 16, 2010
Plaintiff's Rebuttal Disclosures	October 31, 2010
Plaintiff's 15-day Rebuttal Period Ends	November 30, 2010

The extension was agreed to by Patrick C. Stephenson, counsel for Opposer, during a telephone conversation with the undersigned on September 18, 2009. The additional time is required for the parties to engage in settlement discussions.

Respectfully submitted,

Heritage New York, IPA

By: 

Jeffrey S. Steen
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 Attorney for Applicant

Date: September 18, 2009

CERTIFICATE OF TRANSMISSION UNDER 37 C.F.R. §2.197

I hereby certify that this Motion is being electronically transmitted to the TTAB via the US Patent and Trademark website Electronic System for Trademark Trial and Appeals, on September 18, 2009.

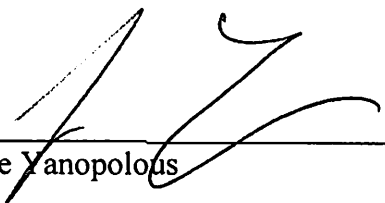
Dated: September 18, 2009


 Jeffrey S. Steen

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **STIPULATED MOTION TO EXTEND TIME FOR APPLICANT TO ANSWER THE NOTICE OF OPPOSITION, DISCOVERY AND TRIAL DATES** was served on counsel for Opposer, this 18th day of September, 2009, by sending same, via first class mail, postage prepaid to:

Patrick C. Stephenson, Esq.
Kutak Rock LLP
The Omaha Building
1650 Farnum Street
Omaha, NE 68102-2186



Julie Yanopolous