

ESTTA Tracking number: **ESTTA467748**

Filing date: **04/18/2012**

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

Proceeding	91193675
Party	Plaintiff Federacion Nacional de Cafeteros de Colombia a/k/a National Federation of Coffee Growers of Colombia
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Keith E. Sharkin/
Date	04/18/2012
Attachments	Motion to Extend - 91193675 -- 04.18.12.pdf ( 3 pages )(79966 bytes )

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

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FEDERACION NACIONAL DE CAFETEROS :  
DE COLOMBIA A/K/A NATIONAL :  
FEDERATION OF COFFEE GROWERS OF :  
COLOMBIA, :  
: :  
Opposer, :  
: Opposition No. 91193675  
v. :  
: :  
YOUSEF S. AL RAJHI TRADING EST., :  
: :  
Applicant. :  
-----x

MOTION UPON CONSENT TO EXTEND  
DISCLOSURE, DISCOVERY AND TESTIMONY PERIODS

Opposer, Federacion Nacional de Cafeteros de Colombia a/k/a National Federation of  
Coffee Growers of Colombia, with the consent of Applicant, Yousef S. Al Rajhi Trading Est.,  
hereby moves the Board to extend the disclosure, discovery and testimony periods in the above-  
referenced opposition for a period of sixty (60) days as follows:

Initial Disclosures Due:	July 4, 2012
Expert Disclosures Due:	November 1, 2012
Discovery Closes:	December 1, 2012
Plaintiff's Pretrial Disclosures:	January 15, 2013
Plaintiff's 30-day Trial Period Ends:	March 1, 2013
Defendant's Pretrial Disclosures:	March 16, 2013
Defendant's 30-day Trial Period Ends:	April 30, 2013

Plaintiff's Rebuttal Disclosures

May 15, 2013

Plaintiff's 15-day Rebuttal Period Ends:

June 14, 2013

During the last two months, counsel for Opposer and Applicant have continued to exchange e-mails regarding settlement. The parties are discussing a possible amendment to the application which would resolve all issues in the proceeding. Applicant's U.S. counsel is awaiting approval for the proposed amendment from Applicant's foreign counsel in Saudi Arabia. Opposer has been advised that Applicant's foreign counsel needs additional time to review the proposal and the draft settlement agreement to confirm that it is acceptable. The parties believe that this matter will likely be settled and request additional time to finalize an agreement. This request is not made for the purposes of delay.

Counsel for Applicant, Evan Anderson, has consented to this extension.

WHEREFORE, the parties respectfully request the Board grant the extension of time set forth above.

Dated: April 18, 2012

DICKSTEIN SHAPIRO LLP  
Attorneys for Opposer  
FEDERACION NACIONAL DE  
CAFETEROS DE COLOMBIA A/K/A  
NATIONAL FEDERATION OF COFFEE  
GROWERS OF COLOMBIA

By:   
Keith E. Sharkin

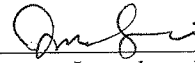
1633 Broadway  
New York, New York 10019-6708  
(212) 277-6500

CERTIFICATE OF SERVICE

It is hereby certified that a true and complete copy of the foregoing Motion Upon Consent to Extend Disclosure, Discovery and Testimony Periods was deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to:

Evan Anderson, Esq.  
John Alunit, Esq.  
Patel & Alunit, PC  
16830 Ventura Blvd., Suite 360  
Encino, California 91436-1711  
Attorneys for Applicant

On this 18<sup>th</sup> day of April , 2012



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Jonathan L. Goodwill