

ESTTA Tracking number: **ESTTA438411**

Filing date: **10/28/2011**

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

Proceeding.	91194817
Applicant	Plaintiff Lincoln National Corporation
Other Party	Defendant Kent G Anderson

## 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 10/29/2011. Lincoln National Corporation requests that such date be extended for 60 days, or until 12/28/2011, 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 :	11/13/2011
Plaintiff's 30-day Trial Period Ends :	12/28/2011
Defendant's Pretrial Disclosures :	01/12/2012
Defendant's 30-day Trial Period Ends :	02/26/2012
Plaintiff's Rebuttal Disclosures :	03/12/2012
Plaintiff's 15-day Rebuttal Period Ends :	04/11/2012

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Lincoln National Corporation has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Lincoln National Corporation 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 record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,  
/jonathan p froemel/  
Jonathan P. Froemel  
jfroemel@btlaw.com  
dlbentleyesq@gmail.com, dlb@dlbentleylawgp.com  
10/28/2011