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

Proceeding	91196025
Party	Plaintiff Pet Holdings Inc.
Correspondence Address	VENKAT BALASUBRAMANI FOCAL PLLC 800 FIFTH AVENUE, SUITE 4100 SEATTLE, WA 98104 UNITED STATES venkat@focallaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Venkat Balasubramani
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Date	12/10/2010
Attachments	Extension of Discovery & Trial Dates.pdf (3 pages)(150533 bytes)

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

In the matter of Trademark Application Serial No. 77/868181
Published in the *Official Gazette* April 13, 2010

PET HOLDINGS INC.,

Opposer,

v.

COMBO VENTURES LLC,

Applicant.

Opposition No. 91196025

**MOTION FOR AN EXTENSION OF
DISCOVERY AND TRIAL DATES WITH CONSENT**

Opposer, Pet Holdings Inc., hereby moves the Board for a thirty day extension of time for all the dates in this proceeding, including all discovery and trial dates. This motion is made for the purpose of avoiding scheduling conflicts, and not for the purpose of delay. Counsel for Applicant, Joel MacMull, consented to this motion by email on December 10, 2010.

The requested dates are set forth below:

	REQUESTED DATE
Deadline for Discovery Conference	1/26/2011
Discovery Opens	1/26/2011
Initial Disclosures Due	2/3/2011
Expert Disclosures Due	6/3/2011
Discovery Closes	7/3/2011
Plaintiff's Pretrial Disclosures	8/17/2011
30day Testimony Period for Plaintiff's Testimony to Close	10/1/2011
Defendant/Counterclaim Plaintiff's Pretrial Disclosures	10/16/2011
30-day Testimony Period for Defendant and Plaintiff in the Counterclaim to Close	11/30/2011

Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due	12/14/2011
30-day Testimony Period for Defendant in the Counterclaim and Rebuttal Testimony for Plaintiff to Close	1/29/2012
Counterclaim Plaintiff's Rebuttal Disclosures Due	2/13/2012
15-day Rebuttal Period for Plaintiff in the Counterclaim to Close	3/14/2012
Brief for Plaintiff Due	5/13/2012
Brief for Defendant and Plaintiff in the Counterclaim Due	6/12/2012
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due	7/12/2012
Reply Brief, if any, for Plaintiff in the Counterclaim Due	7/27/2012

Dated: December 10, 2010

Respectfully Submitted,

By: /s/ Venkat Balasubramani
 Venkat Balasubramani

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Attorneys for Opposer

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing **Motion for an Extension of Discovery and Trial Dates with Consent** was served on opposing counsel pursuant to the prior written agreement of counsel as follows:

Via Email to:

Joel G. MacMull
GOETZ FITZPATRICK LLP
Email: jmacmull@goetzfitz.com

/s/ Sean M. McChesney
Sean M. McChesney