

ESTTA Tracking number: **ESTTA419435**

Filing date: **07/13/2011**

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

Proceeding.	91200124
Applicant	Defendant Jan Jay Rigney
Other Party	Plaintiff Keen, Inc.

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 07/16/2011. Jan Jay Rigney requests that such date be extended for 90 days, or until 10/14/2011, and that all subsequent dates be reset accordingly.

Time to Answer :	10/14/2011
Deadline for Discovery Conference :	11/13/2011
Discovery Opens :	11/13/2011
Initial Disclosures Due :	12/13/2011
Expert Disclosure Due :	04/11/2012
Discovery Closes :	05/11/2012
Plaintiff's Pretrial Disclosures :	06/25/2012
Plaintiff's 30-day Trial Period Ends :	08/09/2012
Defendant's Pretrial Disclosures :	08/24/2012
Defendant's 30-day Trial Period Ends :	10/08/2012
Plaintiff's Rebuttal Disclosures :	10/23/2012
Plaintiff's 15-day Rebuttal Period Ends :	11/22/2012

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

Jan Jay Rigney has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Jan Jay Rigney 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 First Class Mail on this date.

Respectfully submitted,  
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07/13/2011