

ESTTA Tracking number: **ESTTA427026**

Filing date: **08/25/2011**

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

Proceeding.	91200405
Applicant	Defendant Nature & Innovation
Other Party	Plaintiff Casella Wines Pty Ltd.

## 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 09/25/2011. Nature & Innovation requests that such date be extended for 30 days, or until 10/25/2011, and that all subsequent dates be reset accordingly.

Time to Answer :	10/25/2011
Deadline for Discovery Conference :	11/24/2011
Discovery Opens :	11/24/2011
Initial Disclosures Due :	12/24/2011
Expert Disclosure Due :	04/22/2012
Discovery Closes :	05/22/2012
Plaintiff's Pretrial Disclosures :	07/06/2012
Plaintiff's 30-day Trial Period Ends :	08/20/2012
Defendant's Pretrial Disclosures :	09/04/2012
Defendant's 30-day Trial Period Ends :	10/19/2012
Plaintiff's Rebuttal Disclosures :	11/03/2012
Plaintiff's 15-day Rebuttal Period Ends :	12/03/2012

The grounds for this request are as follows:

- *Applicant, a French company has just retained U.S. counsel, who needs the requested time to prepare an answer to the notice of opposition.*

Nature & Innovation has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Nature & Innovation 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,  
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08/25/2011