

ESTTA Tracking number: **ESTTA502571**

Filing date: **10/29/2012**

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

Proceeding.	91202251
Applicant	Defendant Keen, Inc.
Other Party	Plaintiff Jan Jay Rigney

## 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 10/30/2012. Keen, Inc. requests that such date be extended for 30 days, or until 11/29/2012, and that all subsequent dates be reset accordingly.

Time to Answer :	11/29/2012
Deadline for Discovery Conference :	12/29/2012
Discovery Opens :	12/29/2012
Initial Disclosures Due :	01/28/2013
Expert Disclosure Due :	05/28/2013
Discovery Closes :	06/27/2013
Plaintiff's Pretrial Disclosures :	08/11/2013
Plaintiff's 30-day Trial Period Ends :	09/25/2013
Defendant's Pretrial Disclosures :	10/10/2013
Defendant's 30-day Trial Period Ends :	11/24/2013
Plaintiff's Rebuttal Disclosures :	12/09/2013
Plaintiff's 15-day Rebuttal Period Ends :	01/08/2014

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

Keen, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Keen, Inc. 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,

/B. Anna McCoy/

B. Anna McCoy

mccoy@ahmrt.com, penfield@ahmrt.com

aedwards@gablelaw.com

10/29/2012