

ESTTA Tracking number: **ESTTA1046**

Filing date: **06/11/2013**

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

Proceeding.	91207936
Applicant	Plaintiff The Society of Certified Insurance Counselors
Other Party	Defendant Johnathan C. Mun
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

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

The Close of Discovery is currently set to close on 07/17/2013. The Society of Certified Insurance Counselors requests that such date be extended for 30 days, or until 08/16/2013, 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 :	07/17/2013
Discovery Closes :	08/16/2013
Plaintiff's Pretrial Disclosures :	09/30/2013
Plaintiff's 30-day Trial Period Ends :	11/14/2013
Defendant's Pretrial Disclosures :	11/29/2013
Defendant's 30-day Trial Period Ends :	01/13/2014
Plaintiff's Rebuttal Disclosures :	01/28/2014
Plaintiff's 15-day Rebuttal Period Ends :	02/27/2014

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *The parties stipulate to the extension to provide time for continued and further settlement negotiations. The parties believe that additional time is needed because the present dates may impede, rather than encourage, resolution. Further, the parties believe they have been diligent in requesting the extension because the originally set deadlines of this request have not passed, and the parties have acted diligently under the original schedule. Neither party will be prejudiced by the requested extension, because the parties stipulate and consent to the extension. The date for Expert Disclosures has not passed and was set for 06/17/2013, and the discovery period and trial period were set to end on 07/17/2013 and 1/28/2014, respectively; and the requested 30-day extension of deadlines will not unduly prolong conclusion in a timely manner. The Society of Certified Insurance Counselors has provided an e-mail address herewith for itself (dlangle@iptechlaw.com) and for the opposing party*

(james.smedley@sigmalawgroup.com) so that any order on this motion may be issued electronically by the Board.

The Society of Certified Insurance Counselors has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

The Society of Certified Insurance Counselors 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,
/H. Dale Langley, Jr./
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06/11/2013