

ESTTA Tracking number: **ESTTA644527**

Filing date: **12/15/2014**

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

Proceeding	91209759
Party	Defendant ICL Performance Products LP
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Hadi S. Al-Shathir
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Signature	/s/ Hadi S. Al-Shathir
Date	12/15/2014
Attachments	joint motion to extend.pdf(92614 bytes)

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

DANISCO USA, INC.,

Opposer,

v.

ICL PERFORMANCE PRODUCTS LP,

Applicant.

Opposition No. 91209759

JOINT MOTION FOR AN EXTENSION OF
DISCOVERY AND TRIAL PERIODS

Opposer Danisco USA, Inc. and Applicant ICL Performance Products LP hereby move for entry of an Order extending the discovery period by 60 days from December 15, 2014 and resetting all subsequent dates accordingly. If granted, the dates will be reset as follows:

Time to Answer	CLOSED
Deadline for Discovery Conference	CLOSED
Discovery Opens	CLOSED
Initial Disclosures Due	CLOSED
Expert Disclosure Due	CLOSED
Discovery Closes	02/13/2015
Plaintiff's Pretrial Disclosures	03/30/2015
Plaintiff's 30-day Trial Period Ends	05/14/2015
Defendant's Pretrial Disclosures	05/29/2015
Defendant's 30-day Trial Period Ends	07/13/2015
Plaintiff's Rebuttal Disclosures	07/28/2015
Plaintiff's 15-day Rebuttal Period Ends	08/27/2015

As grounds for this motion, each party intends to take a Rule 30(b)(6) deposition of the other party. ICL's 30(b)(6) deposition is currently scheduled for January 22, 2015. Danisco's 30(b)(6) deposition is expected to be taken before February 13, 2015. An extension of the

current discovery deadline is therefore needed so the depositions can be completed during the discovery period.

Accordingly, for good cause shown, an extension of the discovery and trial periods by the Board is respectfully requested.

Respectfully submitted,

CROWELL & MORING, LLP

By: /s/ Dickerson M. Downing
Dickerson M. Downing
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Attorneys for Opposer
Danisco USA Inc.

Dated: December 15, 2014

THOMPSON COBURN LLP

By: /s/ Hadi S. Al-Shathir
Matthew A. Braunel
Hadi S. Al-Shathir
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St. Louis, MO 63101

Attorneys for Applicant
ICL Performance Products LP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served, by e-mail and first class mail, postage prepaid, a copy of the foregoing upon:

Dickerson M. Downing
Crowell & Moring, LLP
590 Madison Avenue
20th Floor
New York, NY 10022

this 15th day of December 2014.

/s/ Hadi S. Al-Shathir