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

Proceeding	91212083
Party	Plaintiff Cambridge Pavers, Inc.
Correspondence Address	LAWRENCE D MANDEL GERTNER MANDEL & PESLAK LLC PO BOX 499 LAKEWOOD, NJ 08701 UNITED STATES lmandel@gmplaw.net, apeslak@gmplaw.net, gcovey@gmplaw.net, rchmara@gmplaw.net
Submission	Motion to Extend
Filer's Name	Lawrence D. Mandel
Filer's e-mail	lmandel@gmplaw.net, apeslak@gmplaw.net, rchmara@gmplaw.net, kgraham@gmplaw.net
Signature	/lawrence d mandel/
Date	07/24/2014
Attachments	OPPOSERS MOTION TO EXTEND.pdf(870920 bytes )

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

In The Matter of Trademark Application Serial Nos. 85/708,890 and 85/708,894  
Filed August 21, 2012 for the mark PAVER ARMOR PRO and PAVER ARMOR  
Published in the Official Gazette on July 23, 2013

CAMBRIDGE PAVERS, INC.,

Opposer,

v.

E.I. DU PONT DE NEMOURS AND  
COMPANY,

Applicant.

Opposition No. 91212083

**OPPOSER'S MOTION TO EXTEND THE TIME  
FOR DISCOVERY AND FOR THE TRIAL PERIODS**

Opposer, Cambridge Pavers, Inc. moves this Honorable Board that the time for discovery and for the trial period deadlines be extended for a period of ninety (90) days.

With the grant of this Motion the closing date for discovery and the testimony periods will be as follows:

Expert Disclosures Due	October 23, 2014
Discovery Closes	November 24, 2014
Plaintiff's Pretrial Disclosures	January 6, 2014
Plaintiff's 30-day Trial Period Ends	February 23, 2014
Defendant's Pretrial Disclosures	March 9, 2014
Defendant's 30-day Trial Period Ends	April 21, 2014
Plaintiff's Rebuttal Disclosures	May 6, 2014
Plaintiff's 15-day Rebuttal Period Ends	June 8, 2014

This extension is necessary in order to allow for sufficient time to complete discovery, in particular, to obtain document production and answers to unanswered interrogatories and the deposition of Applicant. Applicant has not consented to this extension.

Applicant has failed to provide more complete answers to interrogatories and to produce documents in response to requests. A motion to compel is also being filed in this proceeding to compel Applicant to provide more complete answers to discovery requests and to produce documents.

This extension is not sought for the purpose of delay. Opposer has sought Applicant's consent to extend all deadlines but Applicant's attorney has indicated only that Applicant has sold its PAVER ARMOR and PAVER ARMOR PRO marks and product line to Laticrete International, Inc. and Opposer's request for consent to an extension of deadlines has been relayed to the new owner.

In view of the above, there exists good cause for grant of the extension and such favorable action is respectfully requested.

Respectfully submitted,

**GERTNER MANDEL & PESLAK, LLC**  
Attorneys for Opposer

Dated: July 24, 2014

By:



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Lawrence D. Mandel  
P.O. Box 499  
Lakewood, New Jersey 08701  
Tel.: (732) 363-3333

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of July, 2014, a copy of the foregoing Opposer's Motion to Extend was served via email and first class mail to the below listed individual as follows:

Jessica Pratt, Esq.  
Kilpatrick Townsend & Stockton LLP  
1100 Peachtree Street, Ste. 2800  
Atlanta, GA 30309  
*Attorney for Applicant*

  
Lawrence D. Mandel