

ESTTA Tracking number: **ESTTA772969**

Filing date: **09/26/2016**

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

Proceeding	91212475
Party	Plaintiff Epiq Systems, Inc.
Correspondence Address	CARLA C CALCAGNO CALCAGNO LAW PLLC 1250 24TH STREET NW, SUITE 300 WASHINGTON, DC 20037 UNITED STATES cccalcagno@gmail.com,trademarks@canopyparalegal.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Carla C. Calcagno
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Signature	/Carla C. Calcagno/
Date	09/26/2016
Attachments	Epiq Philips Motion to Suspend. 9.26.16.Non-Confidential.pdf(20326 bytes)

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

EPIQ SYSTEMS, INC.,)	
)	
Opposer)	
)	Opposition No. 91212475
v.)	
)	
KONINKLIJKE PHILIPS ELECTRONICS N.V)	
)	
Applicant)	

CONSENTED REQUEST FOR FURTHER 75 DAY EXTENSION

Opposer, with the consent of Applicant, respectfully requests a further suspension of this case. The parties recognize that on June 15, 2016, the Board issued an order notifying the parties that no further extensions or suspensions would be granted in the absence of a detailed report reciting what progress the parties have made toward resolving this matter.

In accordance with the Board’s Order, the parties have today filed a Confidential Submission as ESTTA 772957, which describes the parties’ concerted, detailed and diligent effort to resolve this matter.

For those reasons, Epiq and Philips respectfully seek a two and one half month extension of all dates, commencing with Epiq’s Pretrial Disclosures. It is respectfully submitted that the events set forth in that Confidential Submission constitute good cause and could not have been anticipated by Epiq. Further, both parties’ counsel, have been working diligently to resolve this matter. The extension sought is for good cause and not for purposes of delay.

Epiq Systems respectfully submits that the foregoing constitutes good cause for the requested extension. If the extension is granted, the parties will not be required to undergo the cost and burden and expense of trial while they seek to resolve the matter. Further, a trial at the Board will be avoided resulting in judicial economy.

Chris Kuyper, counsel for Applicant, consented to the 75 day extension in two teleconferences with the undersigned.

Wherefore, it is respectfully requested that the Board grant the consented motion to suspend. If this motion is granted, the case will resume on the following trial schedule:

Plaintiff's Pretrial Disclosures : 12/08/2016

Plaintiff's 30-day Trial Period Ends : 1/22/2017

Defendant's Pretrial Disclosures : 2/06/2017

Defendant's 30-day Trial Period Ends: 03/23/2017

Plaintiff's Rebuttal Disclosures : 04/07/2017

Plaintiff's 15-day Rebuttal Period Ends : 05/07/2017

Respectfully submitted

EPIQ SYSTEMS, INC.

Date: September 26, 2016

By: /Carla C. Calcagno/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing paper has been served upon all parties, at their following addresses of record, by email, by agreement of the parties on this date, the 26th of September 2016:

Chris.kuyper@philips.com, lillian.drumheller@philips.com

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