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Filing date: **03/24/2014**

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

Proceeding	91213516
Party	Plaintiff Emanuel Ungaro Italia S.r.l.
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Ralph H. Cathcart/
Date	03/24/2014
Attachments	Motion on Consent for Extension of Discovery and Trial Deadlines - PND Media.pdf(149909 bytes)

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

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EMANUEL UNGARO ITALIA S.r.l.,	:	
	:	
Opposer,	:	Opposition No. 91,213,516
	:	
v.	:	Serial No. 85/793,430
	:	
PND MEDIA SERVICES, INC.,	:	
	:	
Applicant.	:	
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**MOTION ON CONSENT FOR EXTENSION
OF DISCOVERY AND TRIAL DEADLINES**

Opposer respectfully requests, with Applicant's consent, a thirty (30) day extension of discovery and trial deadlines. The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (1)(2). Initial disclosures are currently due on Monday, March 24, 2014. The parties request that such date be extended for 30 days, or until April 23, 2014, and that all subsequent dates be reset accordingly as follows:

Time to Answer:	CLOSED
Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	April 23, 2014
Expert Disclosures Due:	August 21, 2014
Discovery Closes:	September 20, 2014
Plaintiff's Pretrial Disclosures:	November 4, 2014
Plaintiff's 30-day Trial Period Ends:	December 19, 2014
Defendant's Pretrial Disclosures:	January 3, 2015
Defendant's 30-day Trial Period Ends:	February 17, 2015
Plaintiff's Rebuttal Disclosures:	March 4, 2015
Plaintiff's 15-day Rebuttal Period Ends:	April 3, 2015

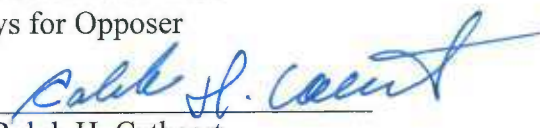
The additional time is requested because the parties are engaged in settlement negotiations and have exchanged proposed settlement terms.

Applicant's attorney, Richard H. Newman, has consented to this request.

Respectfully submitted,

LADAS & PARRY LLP
Attorneys for Opposer

By: _____


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Dated: March 24, 2014

CERTIFICATE OF TRANSMISSION

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES** has been transmitted electronically to the United States Patent and Trademark Office on the date indicated:

Dated: March 24, 2014


Reinaldo M. Roa

CERTIFICATE OF SERVICE

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES** was served via First Class Mail, on the date indicated below, to the following:

Richard H. Newman, Esq.
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Dated: March 24, 2014


Reinaldo M. Roa