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Filing date: **01/15/2015**

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

Proceeding	91215374
Party	Plaintiff Firstbank Holding Company
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Submission	Motion to Extend
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Date	01/15/2015
Attachments	Firstbank 91215374 Motion to Extend.pdf(19236 bytes )

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

FIRSTBANK HOLDING COMPANY

**Opposition No. 91215374**

Opposer,

App. No. 85971591

Mark: FIRSTBANK BEYOND GLOBAL

v.

App. No. 85971492

FIRSTBANK PUERTO RICO,

Mark: FIRSTBANK BEYOND PLATINUM

Applicant.

App. No. 85971454

Mark: FIRSTBANK BEYOND ONE

App. No. 85971371

Mark: FIRSTBANK BEYOND

Filed: 03/03/2014

Published: 09/03/2013

**MOTION TO EXTEND DISCOVERY DEADLINES  
AND TRIAL PERIOD**

Opposer FirstBank Holding Company hereby moves to extend the Expert Disclosure Period in the above-captioned proceeding to sixty (60) days from the present deadline of January 15, 2015 and to reset all discovery deadlines and the trial period accordingly.

Opposer has opposed the registration of four applications filed Applicant by FirstBank Puerto Rico (“Applicant”): Application Serial No. 85/971,591, 85971492, 85971454, and 85971371. In early November, Opposer issued written discovery to Applicant, to which Applicant has not yet responded.

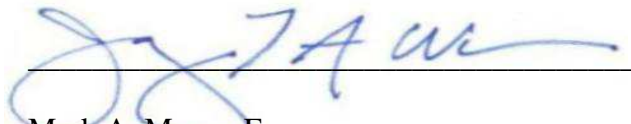
Through December and early January the parties engaged in ongoing, good faith negotiations to resolve this matter – both over the phone and in writing. Additional time is needed to determine whether a resolution can be reached or to pursue outstanding discovery and move the case forward.

Therefore, Opposer respectfully requests that the Board extend the discovery period in this case by sixty (60) days after the current deadline of January 15, 2015 and reset the trial dates accordingly.

Date: January 15, 2015

FIRSTBANK HOLDING COMPANY,

By its attorneys,

A handwritten signature in blue ink, appearing to read 'Mark A. Meyer', is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO EXTEND DISCOVERY DEADLINES AND TRIAL PERIOD** was served upon Applicant via First Class Mail, postage prepaid, this 15th day of January, 2015 to the attorney of record:

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/s/ Karen Wildman