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

Proceeding	91218845
Party	Plaintiff Skins International Trading AG
Correspondence Address	TAMARA CARMICHAEL OLSHAN FROME WOLOSKY LLP 65 EAST 55TH STREET NEW YORK, NY 10022 UNITED STATES tcarmichael@olshanlaw.com, aprovenicio@olshanlaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Tamara Carmichael
Filer's e-mail	tcarmichael@olshanlaw.com, aprovenicio@olshanlaw.com, stro- everw@gtlaw.com, kimjo@gtlaw.com, ameliom@gtlaw.com
Signature	/Tamara Carmichael/
Date	02/24/2016
Attachments	91218845 Mot for EOT.pdf(83117 bytes )

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

*In the Matter of U.S. Trademark Application No. 8615292: ENERSKIN*

Skins International Trading AG,	)	
Opposer,	)	
	)	Opposition No. 91218845
v.	)	
	)	
EnerSkin Korea,	)	
Applicant.	)	

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**MOTION FOR EXTENSION OF DISCOVERY AND TRIAL PERIODS WITH CONSENT**

Opposer, Skins International Trading AG, with the consent of Applicant, EnerSkin Korea, hereby requests a thirty (30) day extension of all deadlines in the above-referenced opposition proceeding to be reset as follows:

Initial Disclosures Due :	03/25/2016
Expert Disclosures Due :	07/23/2016
Discovery Period to Close :	08/22/2016
Plaintiff Pretrial Disclosures :	10/06/2016
Plaintiff's 30-day Trial Period Ends :	11/20/2016
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	12/05/2016
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	01/19/2017
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	02/03/2017
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	03/20/2017
Counterclaim Plaintiff's Rebuttal Disclosures Due:	04/04/2017
15-day Rebuttal Period for Counterclaim Plaintiff Ends :	05/04/2017
Plaintiff's Trial Brief Due :	07/03/2017
Defendant's Trial Brief and Plaintiff in the Counterclaim Due :	08/02/2017
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :	09/01/2017
Reply Brief, if any, for Plaintiff in the Counterclaim Due :	09/16/2017

Applicant consented to this extension via email on February 24, 2016.

The parties are engaging in settlement discussions therefore this request is made in good faith and not merely for delay. The parties have spent the current extension period working out the written settlement agreement reflecting the details of a potential settlement. Specifically, Opposer's Attorney worked with Opposer's outside counsel working with Opposer to prepare a draft agreement, which was preliminarily approved by Opposer on February 16, 2016, then revised by Opposer's Attorney, and sent to Applicant's Attorney on February 19, 2016, who is discussing the draft agreement with Applicant. However, the logistics of the parties (Opposer's

outside counsel is located in Australia, Opposer is located in Switzerland and Applicant is located in Korea) warrants additional time for finalizing and executing such agreement.

For the reasons set forth herein, Opposer, with the consent of Applicant, respectfully requests that the Board grant this extension of time.

Date: February 24, 2016

OLSHAN FROME WOLOSKY LLP

By: /s/ Tamara Carmichael  
Tamara Carmichael  
65 East 55th Street  
New York, NY 10022  
Tel: 212.451.2291  
Email: [TCarmichael@olshanlaw.com](mailto:TCarmichael@olshanlaw.com);  
[AProvencio@olshanlaw.com](mailto:AProvencio@olshanlaw.com)

*Attorneys for Opposer*

**CERTIFICATE OF SERVICE**

I, Angela Provencio, hereby certify that a copy of the MOTION FOR EXTENSION OF DISCOVERY AND TRIAL PERIODS WITH CONSENT is being deposited with the United States Postal Service as first class mail, postage pre-paid, on February 24, 2016 in an envelope addressed to the following:

WILLIAM W STROEVER  
GREENBERG TRAUERIG LLP  
500 CAMPUS DRIVE  
FLORHAM PARK, NJ 07932

/s/ Angela Provencio