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Filing date: **06/23/2016**

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

Proceeding	91218845
Party	Defendant EnerSkin Korea
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Tamara Carmichael
Filer's e-mail	tcarmichael@olshanlaw.com, aprovencio@olshanlaw.com
Signature	/Tamara Carmichael/
Date	06/23/2016
Attachments	91218845 Mot for EOT - ENERSKIN.pdf(83929 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.)	

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 :	07/23/2016
Expert Disclosures Due :	11/20/2016
Discovery Period to Close :	12/20/2016
Plaintiff Pretrial Disclosures :	02/03/2017
Plaintiff's 30-day Trial Period Ends :	03/20/2017
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	04/04/2017
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	05/19/2017
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	06/03/2017
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	07/18/2017
Counterclaim Plaintiff's Rebuttal Disclosures Due:	08/02/2017
15-day Rebuttal Period for Counterclaim Plaintiff Ends :	09/01/2017
Plaintiff's Trial Brief Due :	10/31/2017
Defendant's Trial Brief and Plaintiff in the Counterclaim Due :	11/30/2017
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :	12/30/2017
Reply Brief, if any, for Plaintiff in the Counterclaim Due :	01/14/2018

Applicant consented to this extension via email on June 23, 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 further negotiating and revising a written settlement agreement having significantly narrowed the issues. Applicant's Attorney sent the revised Settlement Agreement to Opposer's Attorney for review and approval, which was in turn sent to outside counsel to review with Opposer. However, the logistics of the parties specifically for Opposer (Opposer's outside counsel is located in Australia, and Opposer is located in Switzerland) and Opposer's travel schedule warrants additional time for finalizing 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: June 23, 2016

OLSHAN FROME WOLOSKY LLP

By: /s/ Tamara Carmichael
Tamara Carmichael
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Attorneys for Opposer

CERTIFICATE OF SERVICE

I, Tamara Carmichael, 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 June 23, 2016 in an envelope addressed to the following:

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

/s/ Tamara Carmichael