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Filing date: **07/06/2015**

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

Proceeding	91220488
Party	Defendant Two Hands Wines Pty Ltd
Correspondence Address	Keith R. Obert WARE FRESSOLA MAGUIRE & BARBER LLP BRADFORD GREEN, BUILDING 5755 MAIN STREET, P.O. BOX 224 MONROE, CT 06468 UNITED STATES kro@warefressola.com, mail@warefressola.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Keith R. Obert
Filer's e-mail	kro@warefressola.com, mail@warefressola.com
Signature	/Keith R. Obert/
Date	07/06/2015
Attachments	MotionforExtensionJuly2015.pdf(11783 bytes )

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

FITA PRETA VINHOS, LDA LLC,	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91220488
	)	
TWO HANDS WINES PTY LTD,	)	Application Serial No. 85/191,378
	)	
	)	
Applicant.	)	

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

Initial Disclosures are currently set to be due on July 14, 2015, and the parties jointly request that such deadline be extended for sixty (60) days, and that all subsequent dates are reset as follows:

<b>Time to Answer :</b>	CLOSED
<b>Deadline for Discovery Conference :</b>	CLOSED
<b>Discovery Opens :</b>	CLOSED
<b>Initial Disclosures Due :</b>	09/12/2015
<b>Expert Disclosure Due :</b>	01/10/2016
<b>Discovery Closes :</b>	02/09/2016
<b>Plaintiff's Pretrial Disclosures :</b>	03/25/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	05/09/2016
<b>Defendant's Pretrial Disclosures :</b>	05/24/2016
<b>Defendant's 30-day Trial Period Ends :</b>	07/08/2016
<b>Plaintiff's Rebuttal Disclosures :</b>	07/23/2016
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	08/22/2016

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

The grounds for this extension request are that the parties are engaged in settlement discussions.

It is submitted that the foregoing constitute a proper showing of good cause for the extension as requested, and it is not interposed for purposes of delay.

Applicant, Two Hands Wines Pty Ltd., has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Applicant, Two Hands Wines Pty Ltd., has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Respectively submitted,  
Two Hands Wines Pty Ltd.

Dated: July 6, 2015

By: /Keith R. Obert/  
Keith R. Obert  
Attorney for Applicant

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION FOR EXTENSION OF DISCOVERY AND TRIAL PERIODS WITH CONSENT was served on this 6<sup>th</sup> day of July 2015, on Opposer's counsel, Matthew A. Becker, by emailing said copy to the following email address:

[matt@beckerlawfirm.com](mailto:matt@beckerlawfirm.com)

By:           /Keith R. Obert/          

Keith R. Obert