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

Proceeding	91220734
Party	Defendant GIA S.r.l.
Correspondence Address	KEITH R OBERT WARE FRESSOLA MAGUIRE & BARBER LLP BRADFORD GREEN BLDG 5, 755 MAIN ST PO 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	01/11/2016
Attachments	MotionforExtensionJan2016.pdf(20180 bytes)

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

JOHN ZIDIAN CO. INC. and)	
ZIDIAN IMPORT, INC.)	
Opposers,)	
)	
v.)	Opposition No. 91220734
)	
GIA S.R.L.,)	Application Serial No. 79/144,096
)	
)	
Applicant.)	

MOTION FOR EXTENSION OF DISCOVERY AND
TRIAL PERIODS WITH CONSENT

Initial Disclosures are currently set to be due on January 11, 2016 (January 9 and 10 being a Saturday and Sunday respectively), and the parties jointly request that such deadline be extended for sixty (60) days, and that all subsequent dates are reset as follows:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	03/09/2016
Expert Disclosure Due :	07/07/2016
Discovery Closes :	08/06/2016
Plaintiff's Pretrial Disclosures :	09/20/2016
Plaintiff's 30-day Trial Period Ends :	11/04/2016
Defendant's Pretrial Disclosures :	11/19/2016
Defendant's 30-day Trial Period Ends :	01/03/2017
Plaintiff's Rebuttal Disclosures :	01/18/2017
Plaintiff's 15-day Rebuttal Period Ends :	02/17/2017

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, GIA S.r.l., has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Applicant, GIA S.r.l., 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,
GIA S.r.l.

Dated: January 11, 2016

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 11th day of January 2016, by first class United States mail, to the following counsel of record:

Edward T. Saadi
Edward T. Saadi LLC
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Boardman, OH 44512
EdwardSaadi@aol.com

By: /Keith R. Obert/

Keith R. Obert