

ESTTA Tracking number: **ESTTA743269**

Filing date: **04/29/2016**

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

Proceeding	91225922
Party	Plaintiff The Echo Design Group, Inc.
Correspondence Address	Edward F. Maluf Seyfarth Shaw LLP 620 8th Ave32nd Floor New York, NY 10018 UNITED STATES bosippto@seyfarth.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Edward F. Maluf
Filer's e-mail	bosippto@seyfarth.com, emaluf@seyfarth.com
Signature	/Edward F. Maluf/
Date	04/29/2016
Attachments	ECHOES_disclosure_extension.pdf(133025 bytes)

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

In the Matter of Application Serial No. 86/203632
Published in the Official Gazette of December 22, 2015

THE ECHO DESIGN GROUP, INC.,

Opposer,

v.

ECHOES & ANGELS, LLC,

Applicant.

Opposition No.: 91225922

**MOTION FOR AN EXTENSION OF ANSWER OR DISCOVERY OR TRIAL
PERIODS WITH CONSENT**

The Close of Discovery is currently set to close on 09/26/2016. The Echo Design Group, Inc. requests that such date be extended for 30 days, or until 10/26/2016, and that all subsequent dates be reset accordingly, as set forth below.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	05/29/2016
Expert Disclosure Due :	09/26/2016
Discovery Closes :	10/26/2016
Plaintiff's Pretrial Disclosures :	12/10/2016
Plaintiff's 30-day Trial Period Ends :	01/24/2017
Defendant's Pretrial Disclosures :	02/08/2017
Defendant's 30-day Trial Period Ends :	03/25/2017
Plaintiff's Rebuttal Disclosures :	04/09/2017
Plaintiff's 15-day Rebuttal Period Ends :	05/09/2017

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions.*

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2). The Echo Design Group, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

The Echo Design Group, Inc. 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.

SEYFARTH SHAW LLP

Dated: April 29, 2016

By: /Edward F. Maluf/

Edward F. Maluf
620 Eighth Avenue
New York, NY 10018-1405
Telephone: (212) 218-4658
Facsimile: (212) 218-5526
E-mail: emaluf@seyfarth.com

Attorneys for Opposer
The Echo Design Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION FOR AN EXTENSION OF ANSWER OR DISCOVERY OR TRIAL PERIODS WITH CONSENT has been served on Applicant by mailing said copy on April 29, 2016, via First Class Mail, postage prepaid, to Applicant's counsel of record at the following address:

Jessica V. Hunt
1611 SOUTH UTICA AVENUE, #162
TULSA, OK 74104
UNITED STATES
huntjessicav@gmail.com

/Joseph M. Walker/
Joseph M. Walker