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

Proceeding	91226828
Party	Plaintiff Domaine du Grand Cros
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Submission	Motion to Extend
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Date	04/18/2018
Attachments	02221742.PDF(427087 bytes)

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

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DOMAINE DU GRAND CROS,	:	Opposition No.: 91226828
	:	
Opposer,	:	Serial No.: 86/670,573
	:	
v.	:	
JULES TAYLOR HOLDINGS LIMITED,	:	Mark: JULES
	:	
Applicant,	:	
-----X		

OPPOSER’S MOTION FOR AN EXTENSION OF TIME

Opposer, Domaine du Grand Cros, hereby moves the Board for a one (1) week extension of time from April 18, 2018 up to and including April 25, 2018 for Opposer to serve objections and cross-questions in connection with the Deposition of Julian Falkner by Written Questions. This Motion is accompanied by the Declaration of Charles P. LaPolla.

On April 17, 2018, Opposer’s counsel spoke with Applicant’s counsel and proposed that the parties stipulate to certain procedural modifications in this proceeding. Specifically, Opposer’s counsel suggested that since Opposer and Applicant have both expressed a desire to seek discovery depositions of representatives of the other party residing in a foreign country, that it would be more cost-effective for the parties not to proceed with Depositions by Written Questions, and instead to cooperate by arranging to have the respective representatives of the parties travel to the United States to have regular oral depositions taken.

In addition, Opposer's counsel advised Applicant's counsel that the trademark which forms the basis of the claims in the Notice of Opposition has been assigned from Opposer to a new party and that subsequent to the assignment Opposer has been acting as a licensee of the new Assignee. As a result, Opposer's counsel advised Applicant's counsel that Opposer wishes to join the new Assignee as a party-Opposer and also to amend the Notice of Opposition in order to amplify the new circumstances.

Opposer's counsel requested Applicant's counsel to consent to the aforementioned joinder of the new party-Opposer and to the filing of an Amended Notice of Opposition and further suggested that it would be in the interests of both parties to agree to schedule regular oral depositions to take place after such joinder and amendment of the Notice of Opposition.

Opposer's counsel alternatively requested that Applicant's counsel consent to an extension of time for Opposer to serve objections and cross-questions if further time was needed for Applicant to consider the aforementioned proposed procedural modifications thereby potentially avoiding the need for Opposer to expend the costs for preparing objections and cross-questions.

On April 18, 2018, counsel for Applicant advised Opposer's counsel that she was not in a position to decline or consent to Opposer's proposed procedural modifications or Opposer's request to join a new party-Opposer and amend the Notice of Opposition because Applicant needed further time to consider these proposals and requests. On the basis of the foregoing, Opposer's counsel requested a one (1) week extension of time for Opposer to serve objections and cross-questions in connection with the Deposition by Written Questions of Julian Faulkner. However, Applicant's counsel also indicated that she would not consent to the one (1) week extension of time for Opposer to serve objections and cross-questions in connection with the Deposition by Written Questions of Julian Faulkner. Opposer's counsel reminded Applicant's counsel of the statement in the Board's Order of March 29, 2018 indicating that the Board expects the parties to cooperate in the discovery process. However, Applicant's counsel continued to decline consent to the requested one (1) week extension of time.

In view of the foregoing, it is respectfully requested that the Board grant Opposer's Motion for an Extension of Time.

Dated: New York, New York
April 18, 2018

Respectfully submitted,



Charles P. LaPolla
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No. 86/670,573
Published in the Official Gazette on November 17, 2017

DOMAINE DU GRAND CROS,

Opposer,

v.

JULES TAYLOR HOLDINGS LIMITED,

Applicant.

Opposition No. 91226828

DECLARATION OF CHARLES P. LAPOLLA

I, CHARLES P. LAPOLLA, hereby declare as follows:

1. I am a member of the firm of Ostrolenk Faber LLP, attorneys of record for Opposer, Domain du Grand Cros, in the above-referenced proceedings. I submit this Declaration in support of Opposer's Motion for an Extension of Time. The facts set forth herein are based upon my personal knowledge or a review of my firm's records.

2. The facts set forth in the aforementioned Motion for an Extension of Time are true and correct to my knowledge.

3. I declare under penalty of perjury that the facts set forth in this Declaration are true and correct to my knowledge.

Date: April 18, 2018
New York, New York



Charles P. LaPolla

CERTIFICATE OF SERVICE

It is hereby certified that a true and complete copy of the foregoing OPPOSER'S MOTION FOR AN EXTENSION OF TIME AND DECLARATION OF CHARLES P. LAPOLLA have been served by Email on April 18, 2018 upon Applicant's counsel as follows:

Charles F. Reidelbach, Jr.
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Justine K. Wong
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trademarks@higgslaw.com



Charles P. LaPolla