ESTTA Tracking number: **ESTTA848488**

Filing date: **09/26/2017**

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

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| Proceeding. | 91236192 |
| Applicant | Defendant<br>OMEGA & DELTA CO, INC |
| Other Party | Plaintiff<br>Web Deals Direct, LLC |
| Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)? | No |

# Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 09/26/2017. OMEGA & DELTA CO, INC requests that such date be extended for 30 days, or until 10/26/2017, and that all subsequent dates be reset accordingly.

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| Time to Answer : | 10/26/2017 |
| Deadline for Discovery Conference : | 11/25/2017 |
| Discovery Opens : | 11/25/2017 |
| Initial Disclosures Due : | 12/25/2017 |
| Expert Disclosure Due : | 04/24/2018 |
| Discovery Closes : | 05/24/2018 |
| Plaintiff's Pretrial Disclosures : | 07/08/2018 |
| Plaintiff's 30-day Trial Period Ends : | 08/22/2018 |
| Defendant's Pretrial Disclosures : | 09/06/2018 |
| Defendant's 30-day Trial Period Ends : | 10/21/2018 |
| Plaintiff's Rebuttal Disclosures : | 11/05/2018 |
| Plaintiff's 15-day Rebuttal Period Ends : | 12/05/2018 |

The grounds for this request are as follows:

- *The passing of Hurricane Maria over Puerto Rico has disrupted the operations of the Defendant's Office. There is no power, water or , land line phones on the island and Internet is intermittent and only available in pockets. Defendant's attorney needs time for things to normalize and for basic services to come back in order to recommence her office operations. Plaintiff's counsel has given his consent to this extension.*

OMEGA & DELTA CO, INC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

OMEGA & DELTA CO, INC has provided an email address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

# Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,
/Vivian Ortiz Ponce/
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09/26/2017