

ESTTA Tracking number: **ESTTA1047966**

Filing date: **04/08/2020**

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

Proceeding	91241359
Party	Defendant IGT Global Solutions Corporation
Correspondence Address	PETER D SIDDOWNAY SAGE PATENT GROUP 4120 MAIN AT NORTH HILLS STREET SUITE 230 RALEIGH, NC 27609 UNITED STATES trademarks@igt.com, psiddoway@sagepat.com, jsteen@sagepat.com 984-219-3358
Submission	Motion to Extend
Filer's Name	Peter D. Siddoway
Filer's email	psiddoway@sagepat.com
Signature	/Peter D. Siddoway/
Date	04/08/2020
Attachments	Motion to Reschedule Defendant Testimony Period.pdf(108987 bytes)

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

Pollard Banknote Limited,	:	
Opposer,	:	
	:	
	:	Opposition No. 91241359 (parent case)
v.	:	
	:	
IGT	:	
Applicant.	:	

APPLICANT IGT’S MOTION TO RESCHEDULE TESTIMONY PERIOD

Currently pending before the Board in this Opposition is Opposer Pollard Banknote Limited’s request that the Trademark Trial and Appeal Board extend the discovery period (Doc. No. 15, dated December 26, 2019). However, as this motion has not been ruled on by the Board, and out of an abundance of caution, Applicant IGT hereby moves the Board to reschedule IGT’s testimony period, as well as all subsequent deadlines, until after the Board has ruled on Opposer’s motion.

Rule 702 in the TBMP provides that the “resetting of the closing date for discovery results in the automatic rescheduling of pretrial disclosure deadlines and testimony periods.” Rule 403.04 includes a similar provision: “An extension of the closing date for discovery will result in a corresponding resetting of the pretrial disclosure deadlines and testimony periods without action by any party.”

While it may be that the Board will reset or extend the dates in this Opposition, it has not done so yet. Thus, IGT feels it is prudent to make an additional motion to preserve its rights to introduce testimony and evidence in this matter.

Rule 702 further provides that it is the Board's preference that a motion to reschedule testimony periods request that the new deadlines be determined, and any period or periods be set to run, from the date of the Board's decision on the motion. Thus, in the event that the deadlines in this Opposition are not reset due to Opposer's currently-pending motion, Applicant IGT requests that the deadline for Defendant's Pretrial Disclosures be rescheduled to 14 days after the Board's Order on Opposer's currently-pending motion. Applicant IGT further requests that all other subsequent deadlines be rescheduled accordingly.

Of course, Applicant IGT understands that in the event the Board resets the current deadlines due to Opposer's motion, this motion will become moot.

Respectfully submitted,

SAGE PATENT GROUP

By /s/ Peter D. Siddoway

Peter D. Siddoway

Lynne A. Borchers

4120 Main at North Hills Street, Suite 230

Raleigh, North Carolina 27609

(984) 219-3358 (telephone)

(984) 538-0416 (facsimile)

Attorneys for Applicant

Dated: April 8, 2020

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing has been served on counsel for Opposer Pollard Banknote Limited by forwarding said copy on April 8, 2020, via email to:

Michael M. Zadrozny
Daniel T. Earle
Attorneys for Opposer
Shlesinger, Arkwright & Garvey LLP
5845 Richmond Highway, Suite 415
Alexandria, VA 22303
(703) 684-5600
mmz@sagllp.com
danearle@sagllp.com
nitasantiago@sagllp.com

By /s/ Peter D. Siddoway
Peter D. Siddoway
4120 Main at North Hills Street, Suite 230
Raleigh, North Carolina 27609
(984) 219-3358 (telephone)
(984) 538-0416 (facsimile)