

ESTTA Tracking number: **ESTTA68682**

Filing date: **02/28/2006**

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

Proceeding.	92044209
Applicant	Plaintiff SAMUEL ROSENBLATT & HELENE ROZENBLAT DBA ERES
Other Party	Defendant Eres Eres S.A. 2 Rue Tronchet FRX 75008 Paris,

Motion for an Extension of Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 04/15/2006. SAMUEL ROSENBLATT & HELENE ROZENBLAT DBA ERES requests that such date be extended for 60 days, or until 06/14/2006, and that all subsequent dates be reset accordingly. The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *Helene Rozenblat is recovering from surgery and will not be able to sit for deposition until April, 2006.*

SAMUEL ROSENBLATT & HELENE ROZENBLAT DBA ERES has secured the express consent of all other parties to this proceeding for the extension requested herein.

SAMUEL ROSENBLATT & HELENE ROZENBLAT DBA ERES 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.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/mina hamilton/

Mina Hamilton

hamilton@lbbslaw.com, astor@lbbslaw.com, tespinoza@lbbslaw.com

mchiappetta@fzlz.com

02/28/2006