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

Proceeding	92045378
Party	Plaintiff Toto U.S.A., Inc. Toto U.S.A., Inc. 1155 Southern Road Morrow, GA 30260
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Submission	Stipulated/Consent Motion to Reopen
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Date	04/23/2007
Attachments	doc006.PDF (2 pages)(15308 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Toto U.S.A., Inc.,)
)
) Petitioner,)
) Cancellation No. 92-045,378
) v.)
) Serial No. 76/625190
)
) Globe Union Industrial Corp.,)
)
) Applicant.)

STIPULATED MOTION TO REOPEN AND EXTEND DISCOVERY PERIODS

United States Patent and Trademark Office
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, Virginia 22313-1451

Sir:

The discovery period for the present cancellation action ended on April 13, 2007. In order for Applicant and Petitioner to consider possible settlement possibilities, Applicant and Petitioner respectfully request that the Trademark Trial and Appeal Board (“the Board”) reopen the period for discover and grant an additional sixty (60) days for all discovery and testimony periods to fall as follows:

Discovery period to close:	June 12, 2007
30-day testimony period for party in position of plaintiff to close:	September 10, 2007
30-day testimony period for party in position of defendant to close:	November 9, 2007
15-day rebuttal testimony period for plaintiff to close:	December 24, 2007

Applicant's attorney, Linda McLeod, consented to this request via electronic mail on April 19, 2007.

Respectfully submitted,

Toto U.S.A., Inc.

A handwritten signature in black ink, appearing to read "Caroline L. Keller", written over a horizontal line.

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Date: April 23, 2007