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

Proceeding	92053315
Party	Plaintiff American University
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Submission	Stipulated/Consent Motion to Extend
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Date	06/21/2014
Attachments	June 21 2014 Consented Motion for Extension of Proceeding Deadlines for Settlement for Sixty Days.pdf(13331 bytes)

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

American University,)	
Petitioner,)	
)	
v.)	Cancellation No. 92053315
)	
The American University for)	
Science and Technology,)	
Respondent.)	

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Consented Motion for Extension of Proceeding Deadlines for Settlement for Sixty Days

The parties are working to reach settlement and are also working to address outstanding discovery issues. With the consent of the President/CEO for The American University for Science and Technology (“AUSTC”) and on behalf of both of the parties, American University respectfully requests that the deadlines in this proceeding be extended by sixty days, as set out below, to allow the parties to continue these settlement and discovery efforts.

Per the April 25, 2014 Board Order, the parties provide the following update about their efforts to reach settlement and to complete discovery. Continuing the settlement considerations as previously outlined in the parties’ earlier reports to the Board (most recently Docket Nos. 31 and 33), counsel for American University and the President/CEO for AUSTC (AUSTC represents itself *pro se* in this case) exchanged emails on May 30, 2014, about settlement and about responding to outstanding discovery requests. The parties exchanged further emails about the settlement considerations and discovery issues on June 4, 2014, with the President/CEO for AUSTC requesting feedback on the settlement proposal. On June 9, 2014, counsel for American University emailed counsel for the President/CEO for AUSTC, providing feedback about the

settlement proposal, extending an ongoing counterproposal, and addressing outstanding discovery issues relating to previously served discovery requests. On June 11, 2014, the President/CEO for AUSTC emailed counsel for American University about the settlement discussions and about the outstanding discovery issues that the parties are working to address. On June 12 and June 14, 2014, the parties exchanged additional emails in connection with efforts to address the outstanding discovery issues. On June 20, 2014, the parties exchanged further emails concerning efforts to address outstanding discovery issues. In his June 20, 2014 email, the President/CEO of AUSTC provided to counsel for Petitioner AUSTC's consent to seek this consented extension on behalf of the parties.

Counsel for American University and prior counsel for AUSTC previously conducted the required discovery conference for this proceeding. As summarized above, the parties are still cooperating and trying to reach a settlement acceptable to both parties concerning ownership and use of the marks at issue in this proceeding and are also working on addressing discovery issues. The parties want to continue their efforts to discuss and reach settlement and to address and complete discovery.

Under the current schedule, the discovery period is scheduled to close on Monday, June 23, 2014. The parties respectfully request that such date be extended for 60 days, or until August 22, 2014, and that all subsequent dates be reset accordingly. Implementing this consented extension, the proceeding dates will be:

Discovery Closes:	August 22, 2014
Plaintiff's Pretrial Disclosures:	October 2, 2014
Plaintiff's 30-day Trial Period Ends:	November 16, 2014
Defendant's Pretrial Disclosures:	December 1, 2014
Defendant's 30-day Trial Period Ends:	January 15, 2015

Plaintiff's Rebuttal Disclosures: January 30, 2015

Plaintiff's 15-day Rebuttal Period Ends: March 1, 2015

As shown above, the parties do not file this consented request for purposes of delay. The parties want to continue their settlement efforts, are working to complete discovery, and submit that extending the proceeding deadlines will save resources for the Board and for the parties.

The President/CEO for AUSTC has communicated his organization's consent to counsel for American University to file this consented motion on behalf of the parties in an email dated June 20, 2014. With this motion counsel for American University provides its email address and the email address designated for the President/CEO of AUSTC, so that any order on this motion may be issued electronically by the Board.

Dated: June 21, 2014

Respectfully submitted,

American University

/Alisa C. Simmons/

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Consented Motion for Extension of Proceeding Deadlines for Settlement for Sixty Days has been served upon all parties, at their address of record by facsimile or email (by agreement only) set forth below on this date:

Dr. M. A. Wahab
President/CEO
The American University for Science and Technology
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Dated this 21st day of June, 2014.

/Alisa C. Simmons/
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