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Filing date: **05/28/2013**

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

Proceeding	92053605
Party	Plaintiff SLG Productions, Inc.
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Submission	Stipulated/Consent Motion to Extend
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Date	05/28/2013
Attachments	motion on consent.pdf(82805 bytes)

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

In the matter of U.S. Registration No. 3,803,470
Application Serial No. 76/687893
Trademark: THE SAMURAI BLADE & Design
Registered on June 5, 2010

SLG PRODUCTIONS, INC.,	§	
Petitioner,	§	
v.	§	Cancellation No. 92053605
KABUSHIKI KAISHA ASABIRAKI	§	
Respondent.	§	

**MOTION ON CONSENT TO EXTEND DEADLINES FOR
PRETRIAL DISCLOSURES AND TESTIMONY PERIODS**

Petitioner, SLG Productions, Inc. (“SLG” or “Petitioner”), by its attorneys, hereby respectfully moves the Trademark Trial and Appeal Board (“Board”), with the consent of Respondent, Kabushiki Kaisha Asabiraki (“Asabiraki” or “Respondent”), for an order extending the deadlines for pretrial disclosures and testimony periods by thirty (30) days in accordance with the following schedule:

Plaintiff’s Pretrial Disclosures	:	June 27, 2013
Plaintiff’s 30-day Trial Period Ends	:	August 11, 2013
Defendant’s/Counterclaim Plaintiff’s Pretrial Disclosures	:	August 26, 2013
Defendant’s/Counterclaim Plaintiff’s 30-day Trial Period Ends	:	October 10, 2013
Plaintiff’s/Counterclaim Defendant’s Rebuttal Disclosures	:	October 25, 2013

30-day Trial and Rebuttal Testimony Period for Plaintiff/Counterclaim Defendant Ends	:	December 9, 2013
Counterclaim Plaintiff's Rebuttal Disclosures	:	December 24, 2013
Counterclaim Plaintiff's 15-day Rebuttal Period Ends	:	January 23, 2014
Plaintiff's Trial Brief	:	March 24, 2014
Defendant's/Counterclaim Plaintiff's Brief	:	April 23, 2014
Plaintiff's Reply and Counterclaim Defendant's Brief	:	May 23, 2014
Counterclaim Plaintiff's Brief	:	June 7, 2014

This extension of time is requested because the parties have made significant progress in settlement negotiations and are close to finalizing an agreement. Over a number of months, the parties exchanged a series of emails and letters, and had several phone calls to discuss settlement and put together the basic framework of an agreement. The parties have now reached an agreement as to all significant terms for settlement, and a draft of the formal agreement has been provided to Respondent. The fact that Respondent is located in Japan has resulted in some delay, but it is counsels' understanding that no major points of contention remain and that the parties are close to finalizing the agreement. In order to conserve the resources of the parties and the Board, and to expedite an amicable resolution of this matter, Petitioner respectfully requests, and Respondent consents to, extend all dates by 30 days to allow the parties time to finalize settlement. "Ordinarily, a consented motion to extend or reopen will be granted by the Board." TBMP § 509.02.

There is no danger of prejudice to either party, as this motion is requested jointly. Moreover, this motion is made in good faith and without any intention of causing a delay in this proceeding, and the brief extension requested should not adversely impact these proceedings.

WHEREFORE, for the reasons stated and the good cause shown herein, Petitioner, by its counsel and with Respondent's consent, respectfully requests that the deadlines for pretrial disclosures and testimony periods be extended and reset in accordance with the above schedule.

Respectfully submitted,

BAKER BOTTS L.L.P.

Date: May 28, 2013

By: /s/ Suzanne Hengl

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New York, NY 10112
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Attorneys for Petitioner
SLG PRODUCTIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and accurate copy of the foregoing MOTION ON CONSENT TO EXTEND DEADLINES FOR PRETRIAL DISCLOSURES AND TESTIMONY PERIODS was served via email on counsel of record for Respondent, Kabushiki Kaisha Asabiraki, as follows:

Robert W. Adams, Esq.
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Dated: May 28, 2013

/s/ Suzanne Hengl
Suzanne Hengl