

ESTTA Tracking number: **ESTTA642963**

Filing date: **12/05/2014**

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

Proceeding	92057182
Party	Plaintiff Stephen R. Enos
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Submission	Opposition/Response to Motion
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Date	12/05/2014
Attachments	Consent Motion to Continue Motion to Compel.pdf(141957 bytes)

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

In the Matter of Registration Nos. 3,777,422 and 4,090,760
Marks: ELECTRIC DAISY CARNIVAL; EDC Issued:
April 20, 2010; January 24, 2012

Stephen R. Enos.

Petitioner,

v.

Pasquale Rotella and Insomniac Holdings, LLC.

Respondent.

Cancellation No. 92057182

Commissioner for Trademarks
TTAB - BOX FEE
P.O. Box 1451
Alexandria, Virginia 22313-1451

**MOTION BY CONSENT FOR A STAY OF PLAINTIFF'S OBLIGATION TO RESPOND
TO DEFENDANT'S MOTION TO COMPEL AND OUTSTANDING DISCOVERY.**

Defendant has filed a Motion to Compel directed to Plaintiff that must be opposed by December 6, 2014. Defendants have also served discovery, including document requests, interrogatories and requests for admission on Plaintiff. Plaintiff's TTAB attorney in this matter, Harry G. Melkonian, is ill and is scheduled to undergo surgery on/or about 12/05/2014. Therefore the parties consent that Plaintiff's obligation to oppose Defendant's Motion to Compel and all other dates not Stayed by Board's Order of 11/26/14, be Stayed for 30 days or until 01/08/2015 and that all other dates be reset accordingly.

Respectfully submitted,

Dated: December 5, 2014

C2 LAW GROUP, P.C.

By: 

Christopher L. Rudd
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