

ESTTA Tracking number: **ESTTA640579**

Filing date: **11/21/2014**

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

Proceeding.	92058553
Applicant	Plaintiff Laboratorios y Drogueria Lainez S.A. de C.V.
Other Party	Defendant Saul Salamanca dba Promesa Distributors Inc.
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 11/29/2014. Laboratorios y Drogueria Lainez S.A. de C.V. requests that such date be extended for 30 days, or until 12/29/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	11/29/2014
Discovery Closes :	12/29/2014
Plaintiff's Pretrial Disclosures :	02/12/2015
Plaintiff's 30-day Trial Period Ends :	03/29/2015
Defendant's Pretrial Disclosures :	04/13/2015
Defendant's 30-day Trial Period Ends :	05/28/2015
Plaintiff's Rebuttal Disclosures :	06/12/2015
Plaintiff's 15-day Rebuttal Period Ends :	07/12/2015

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Laboratorios y Drogueria Lainez S.A. de C.V. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Laboratorios y Drogueria Lainez S.A. de C.V. 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,

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11/21/2014