ESTTA Tracking number: **ESTTA711345**

Filing date: **11/30/2015**

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

Proceeding.	92062487
Applicant	Defendant N.V. Sumatra Tobacco Trading Company
Other Party	Plaintiff CTBAT International Co. Limited
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

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

The Defendant's Time to Answer is currently set to close on 12/02/2015. N.V. Sumatra Tobacco Trading Company requests that such date be extended for 30 days, or until 01/01/2016, and that all subsequent dates be reset accordingly.

Time to Answer :	01/01/2016
Deadline for Discovery Conference :	01/31/2016
Discovery Opens :	01/31/2016
Initial Disclosures Due :	03/01/2016
Expert Disclosure Due :	06/29/2016
Discovery Closes :	07/29/2016
Plaintiff's Pretrial Disclosures :	09/12/2016
Plaintiff's 30-day Trial Period Ends :	10/27/2016
Defendant's Pretrial Disclosures :	11/11/2016
Defendant's 30-day Trial Period Ends :	12/26/2016
Plaintiff's Rebuttal Disclosures :	01/10/2017
Plaintiff's 15-day Rebuttal Period Ends :	02/09/2017

The grounds for this request are as follows:

- *Registrant is an Indonesian entity with no in-house trademark counsel and the time is needed to fully inform the Registrant of the legal issues and options for dealing with the Petition.*

N.V. Sumatra Tobacco Trading Company has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

N.V. Sumatra Tobacco Trading Company 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,
/jpw/
J. Paul Williamson
trademark@vwiplaw.com
lisa.rosaya@bakermckenzie.com
11/30/2015