

ESTTA Tracking number: **ESTTA810411**

Filing date: **03/30/2017**

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

|  |   |
|--|---|
| Proceeding.  | 92065038                                  |
| Applicant  | Defendant<br>Alandra L. Washington        |
| Other Party  | Plaintiff<br>The Cellular Connection, LLC |
| 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 03/30/2017. Alandra L. Washington requests that such date be extended for 30 days, or until 04/29/2017, and that all subsequent dates be reset accordingly.

|   |            |
|---|------------|
| Time to Answer :                          | 04/29/2017 |
| Deadline for Discovery Conference :       | 05/29/2017 |
| Discovery Opens :                         | 05/29/2017 |
| Initial Disclosures Due :                 | 06/28/2017 |
| Expert Disclosure Due :                   | 10/26/2017 |
| Discovery Closes :                        | 11/25/2017 |
| Plaintiff's Pretrial Disclosures :        | 01/09/2018 |
| Plaintiff's 30-day Trial Period Ends :    | 02/23/2018 |
| Defendant's Pretrial Disclosures :        | 03/10/2018 |
| Defendant's 30-day Trial Period Ends :    | 04/24/2018 |
| Plaintiff's Rebuttal Disclosures :        | 05/09/2018 |
| Plaintiff's 15-day Rebuttal Period Ends : | 06/08/2018 |

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

Alandra L. Washington has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Alandra L. Washington 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 of record by Email on this date.

Respectfully submitted,  
/Eugene J. Rath III/

Eugene J. Rath III  
docket@flynnthiel.com  
denis.shamo@bakermckenzie.com  
03/30/2017