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

Proceeding	91200893
Party	Plaintiff Repify, Inc.
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Submission	Stipulated/Consent Motion to Extend
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Date	07/01/2014
Attachments	Joint Motion to Extend Discovery and Trial Periods for 30 days (as filed) 7-01-2014.pdf(39835 bytes)

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

Repify, Inc.,)
)
Opposer/Counterclaim-Respondent,)
)
v.)
)
Reppify LLC)
)
Applicant/Counterclaim-Petitioner.)
_____)

Opposition No. 91200893

**CONSENTED MOTION TO EXTEND
DISCOVERY AND TRIAL PERIODS
FOR 30 DAYS**

Commissioner for Trademarks
Trademark Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1451
Alexandria, VA 22313-1451

CONSENTED MOTION TO EXTEND DISCOVERY AND TRIAL PERIODS
FOR 30 DAYS

In the opposition no. 91200893, Opposer, Repify, Inc., hereby submits this consented motion to extend discovery and trial periods for 30-days. The Applicant, Reppify LLC, has consented to the 30-day extension of the discovery and trial periods. The consented motion is being filed based on the extraordinary circumstances in settling this matter between two parties where there are a number of complex issues which must be addressed in an agreement. The parties are very close to final completion of a settlement agreement and request an additional 30-days to enable finalization and execution of the same.

Specifically, pursuant to the Consented Motion dated June 2, 2014, the Expert Disclosures are due on July 1, 2014. The parties jointly request that the discovery and trial

periods be extended for 30-days and all dates in the opposition extended accordingly. The new (proposed) dates are set out below.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosures Due :	08/01/2014
Discovery Period to Close :	09/01/2014
Plaintiff Pretrial Disclosures :	10/15/2014
Plaintiff's 30-day Trial Period Ends :	11/30/2014
Defendant's Pretrial Disclosures :	12/14/2014
Defendant's 30-day Trial Period ends :	1/28/2015
Plaintiff's Rebuttal Disclosures :	2/13/2015
Plaintiff's 15-day Rebuttal Period Ends :	3/12/2015

The parties request the extension based on continued engagement in finalizing the terms of the written settlement agreement. Below is a detailed report regarding the status of the settlement negotiations.

The parties have actively been working with their respective clients to exchange a finalized settlement agreement for execution. With the final exchange, the parties are very close to finalizing the agreement for execution. During this last extension, the parties were able to come to agreement on the primary terms and most of the secondary terms. Discussions have been directed to the remaining secondary terms and to proper parties to execute the agreement. It is expected that execution of the agreement can occur in the next 30-day period.

The additional extension is requested to enable the parties' time to conduct a final review of the terms of the written settlement agreement before execution, as well as obtain the necessary

signatures. As the settlement agreement is in its close-to-finalized form, both parties are optimistic about the settlement of this matter in this next extension period.

The parties are not requesting an additional suspension to improperly delay the proceedings. Instead, the extension request is being made so that the parties can conduct a final review of the settlement. If settlement is finalized, it will avoid the need for the U.S. opposition proceeding which will save the Board time and effort.

Accordingly, Opposer, Repify, Inc., and Applicant, Reppify LLC, respectfully jointly submit and sincerely request that the Board allow the discovery and trial periods to be extended for an additional thirty (30) days and to extend the dates as listed above.

Counsel for Opposer, Repify, Inc., further provides the certificate of service and Counsel for Reppify LLC has agreed to service of the Consent Motion by U.S. first class mail.

Dated: July 1, 2014

Respectfully submitted,

Alleman Hall McCoy Russell And Tuttle LLP



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Attorney for Opposer

CERTIFICATE OF SERVICE

I, B. Anna McCoy, hereby certify that on July 1, 2014, a true and correct copy of the foregoing Consented Motion To Extend Discovery And Trial Periods For 30 Days was served via email (by agreement of counsel) upon Ameet S. Matharu at: ameer.matharu@chugh.com



B. Anna McCoy