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

Proceeding	91203706
Party	Plaintiff Chatham Imports, Inc.
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Date	03/01/2013
Attachments	Joint Motion to Extend Expert Deadline.pdf ( 3 pages )(93455 bytes )

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

CHATHAM IMPORTS, INC.,  
Opposer, Counterclaim Defendant,  
Counter-counterclaim Plaintiff,

vs.

WASHINGTON PLACE LLC,  
Applicant, Counterclaim Plaintiff,  
Counter-counterclaim Defendant.

**Opposition No. 91203706**

U.S. Serial No. 77/962,565  
For the Mark **KNOW THY FARMER**

**JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE**

The parties, Opposer Chatham Imports, Inc. (“Chatham”) and Applicant Washington Place LLC (“Washington Place”), hereby move for an order suspending the expert disclosure deadline, currently set for March 1, 2013, during the Board’s consideration of the pending Motion to Compel filed by Chatham on February 27, 2013. Pursuant to 37 CFR 2.120(e)(2), the filing of that motion suspends the case, but “shall not toll the time for any party to comply with any disclosure requirement.”

The parties believe that resolution of the pending Motion to Compel, along with other disputes, constitute good cause to suspend the expert disclosure deadline. An extension would provide the parties ample time to disclose their expert witnesses after the pending Motion to Compel is decided. Accordingly, the parties respectfully request that the expert disclosure deadline be reset for 30 days from the date that the Board rules on the pending discovery motion, with the subsequent scheduling deadlines to be reset accordingly.

Chatham has conferred with Washington Place regarding this motion, and Washington Place joins Chatham regarding the extension requested herein.

Dated this 1<sup>st</sup> day of March, 2013.

Respectfully submitted,

s/Tracy A. Stitt/

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ATTORNEYS FOR OPPOSER

*Chatham Imports, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March, 2013, a true and correct copy of the above and foregoing document entitled JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE was served via overnight courier on the following:

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Attorney for Applicant

s/Tracy A. Stitt/  
Attorney for Opposer  
*Chatham Imports, Inc.*