

ESTTA Tracking number: **ESTTA559437**

Filing date: **09/13/2013**

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

Proceeding	91203706
Party	Defendant Washington Place LLC
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Jeffrey A. Lindenbaum
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Signature	/Jeffrey A. Lindenbaum/
Date	09/13/2013
Attachments	N552_motion for extension_130913.pdf(11531 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**

**CONSENT MOTION FOR 30-DAY EXTENSION
FOR SETTLEMENT**

Washington Place LLC (“Washington Place”) with the consent of Chatham Imports, Inc. (“Chatham”), hereby moves for a 30-day extension of the deadlines in this matter. Good cause exists for the extension because the parties are presently engaged in settlement discussions.

Accordingly, the parties respectfully request that the Board re-set the deadlines as follows:

Expert Disclosures Due	November 21, 2013
Discovery Closes	December 21, 2013
Chatham as plaintiff in the opposition, defendant in counterclaim, and plaintiff in counter-counterclaim: Pretrial Disclosures due	February 4, 2014
Chatham 30-day testimony period to close	March 21, 2013
Washington Place as defendant in the opposition, plaintiff in counterclaim, and defendant in counter-counterclaim Pretrial Disclosures	April 5, 2014
Washington Place 30-day testimony period to close	May 20, 2014
Chatham Rebuttal Disclosures	June 4, 2014
Chatham 30-day testimony period and rebuttal testimony to close	July 19, 2014
Washington Place Rebuttal Disclosures	August 3, 2014
Washington Place 15-day rebuttal period to close	September 2, 2014
BRIEFS SHALL BE FILED AS FOLLOWS:	
Brief for Chatham in the opposition and counter-counterclaim	November 1, 2014

Brief for Washington place in the counterclaim	December 1, 2014
Brief of Chatham in counter-counterclaim, and reply brief, if any, in the opposition	December 31, 2014
Reply brief, if any, for Washington place in the counter-counterclaim	January 15, 2015

Respectfully Submitted,

/Jeffrey A. Lindenbaum/

Jeffrey A. Lindenbaum

Govinda M. Davis

COLLEN *IP*

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Attorneys for Washington Place, LLC

Dated: September 13, 2013

CERTIFICATE OF SERVICE

I, Jeffrey A. Lindenbaum hereby certify that on September 13, 2013, a copy of the foregoing Motion for Extension was served, via First Class Mail, postage pre-paid, on Chatham Imports Inc.'s attorney of record at the following address:

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____/Jeffrey A. Lindenbaum/____