

ESTTA Tracking number: **ESTTA655382**

Filing date: **02/11/2015**

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

Proceeding	91216538
Party	Plaintiff Derek A. Lopez
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Submission	Stipulated/Consent Motion to Reopen
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Date	02/11/2015
Attachments	Joint Motion to Reopen and Extend Discovery.pdf(11350 bytes )

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

DEREK A. LOPEZ,	)	
	)	
Opposer,	)	Oppn. Nos.: 91216538
	)	91216605
	)	91216672
v.	)	
	)	Application Serial No.: 85/310,186
TED WONG JKD, LLC,	)	Mark: <b>TED WONG JEET KUNE DO</b>
	)	and Design
	)	
Applicant.	)	Publication Date: January 21, 2014
	)	

**JOINT MOTION TO RE-OPEN AND EXTEND DISCOVERY**

Opposer Derek Lopez and Applicant Ted Wong JKD, LLC, by and through their undersigned counsel, hereby request that the Board re-open and extend the Discovery Period and in support thereof would state:

1. The parties are simultaneously engaged in three (3) oppositions, namely, Opposition Proceeding Numbers: 91216538; 91216605; and 91216672 (collectively the “Proceedings”).
2. The Proceedings have different deadlines.
3. The parties have agreed to treat the Proceedings as if they contain the same deadlines, using the deadlines of Proceeding Number 91216672.
4. The parties stipulated to a sixty (60) day extension of the deadlines in Proceeding Number 91216672.
5. The parties did not file a timely stipulation for extension of time and the Discovery closed on February 8, 2014.

6. The parties are currently engaged in the discovery process but it is not yet complete. Accordingly, the parties would like to re-open and extend the discovery period.

7. The parties make this request in good faith and not in an effort to unnecessarily prolong the proceedings.

WHEREFORE the parties jointly request the Board re-open the Discovery period and grant the parties a sixty (60) day extension of time in which to complete Discovery.

Date: February 11, 2015

Respectfully submitted,

By: /s/Jon M. Gibbs

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 11, 2014, I served a true and correct copy of the foregoing via e-mail to:

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