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Filing date: **02/24/2016**

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

| | |
|------------------------|---|
| Proceeding | 91216605 |
| Party | Plaintiff Derek A. Lopez |
| Correspondence Address | JON M GIBBS LOWNDES DROSDICK DOSTER KANTOR & REED PA 215 N EOLA DR ORLANDO, FL 32801 UNITED STATES trademarks@lowndes-law.com, jon.gibbs@lowndes-law.com |
| Submission | Motion to Extend |
| Filer's Name | Jon M. Gibbs, Reg. No. 47,594 |
| Filer's e-mail | trademarks@lowndes-law.com, jon.gibbs@lowndes-law.com |
| Signature | /Jon M. Gibbs/ |
| Date | 02/24/2016 |
| Attachments | Motion for Extension of Time.pdf(11330 bytes) |

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

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

OPPOSER’S MOTION FOR EXTENSION OF TIME

Opposer Derek Lopez, by and through his undersigned counsel, hereby requests that the grant an extension of time extending the Case Management Schedule by thirty (30) days 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 parties have engaged in discovery and have conferred regarding a testimony stipulation.
3. The parties however have not had the opportunity to finalize the terms of the discussed stipulation, despite correspondence up to and including yesterday’s date of February 23, 2016.

4. Counsel for the Applicant, Mr. Minch is currently unavailable awaiting a jury verdict and has had limited availability. Accordingly, Opposer is unaware of whether Applicant objects or stipulates to the requested extension.

5. Today is the deadline for Opposer's 30-day trial period and Opposer files this Motion in an abundance of caution to preserve Opposer's Testimony Period in the event a stipulation is not reached.

6. Opposer respectfully requests that the Case Management deadlines be extended by 30 days.

7. Opposer makes this request in good faith and not in an effort to unnecessarily prolong the proceedings.

WHEREFORE Opposer requests the Board extend the Case Management schedule by thirty (30) days of time in which to complete Discovery.

Date: February 24, 2016

Respectfully submitted,

By: /s/Jon M. Gibbs

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Attorney for Opposer
Derek A. Lopez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 24, 2016, I served a true and correct copy of the foregoing via e-mail to:

Theodore J. Minch
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By: /s/Jon M. Gibbs
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