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

Proceeding	91216605
Party	Defendant Ted Wong JKD, LLC
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Submission	Stipulated/Consent Motion to Extend
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Date	10/26/2015
Attachments	Case Management Stipulation (As Filed) 10-18-15.pdf(27406 bytes)

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

DEREK A. LOPEZ, an Individual,)	
)	
Opposer,)	Opposition Nos.: 91216672, 91216605,
)	91216538
vs.)	
)	Serial Nos.: 85/310,210, 85/310,234,
TED WONG JKD, LLC,)	85/310,186
)	
Applicant.)	

PARTIES’ JOINT MOTION TO REVISE THE CASE MANAGEMENT PLAN

Comes now Applicant TED WONG JKD, LLC, by counsel, Theodore J. Minch, and Opposer DEREK A. LOPEZ, by counsel Jon M. Gibbs (Applicant and Opposer are hereinafter referred to as the “Parties”), together, and hereby jointly move the Board to adopt the proposed revised case management deadlines. In support of the motion, the Parties do hereby state and aver as follows:

1. The Parties are simultaneously engaged in three (3) oppositions, namely, Opposition Proceeding Numbers: 91216538; 91216605; and 91216672 (collectively the “Proceedings”).
2. During their pre-trial telephone conference, the Parties agreed to adopt the case management schedule contained in the pre-trial order dated June 3, 2014 in Opposition Number 91216672 as to all three pending opposition proceedings.
3. By way of pre-trial orders dated March 11, 2015, the deadlines for all three (3) oppositions were made uniform.

4. Upon joint motion by the Parties, on May 28, 2015 the Board agreed to extend the following case management deadlines.

Discovery Closes 7/12/2015
Plaintiff's Pretrial Disclosures 8/26/2015
Plaintiff's 30-day Trial Period Ends 10/10/2015
Defendant's Pretrial Disclosures 10/25/2015
Defendant's 30-day Trial Period Ends 12/09/2015
Plaintiff's Rebuttal Disclosures 10/24/2015
Plaintiff's 15-day Rebuttal Period Ends 01/23/201.

5. As a result the ongoing exchange of discovery and the open communications between the Parties with regard to these matters and, even, the potential resolution of the same, and, additionally, in light of counsel for the Parties' respective litigation calendars, the Parties have agreed to extend all pending / open deadlines in these matters as follows:

Discovery Closes 11/26/2015 (Parties to exchange documents 10/26/2015)
Plaintiff's Pretrial Disclosures 11/26/2015
Plaintiff's 30-day Trial Period Ends 02/01/2016
Defendant's Pretrial Disclosures 02/15/2016
Defendant's 30-day Trial Period Ends 05/13/2016
Plaintiff's Rebuttal Disclosures 05/27/2016
Defendant's 15-day Rebuttal Period Ends 06/10/2016
Plaintiff's Trial Brief Due July 27, 2016
Defendant's Trial Brief Due August 26, 2016
Plaintiff's Response Brief Due September 9, 2016
Defendant's Response Brief Due September 23, 2016

6. Based upon the foregoing, the Parties desire the case management plan be amended in accordance with the foregoing schedule.

7. The Parties have exchanged disclosures and neither party anticipates the retention of experts in these matters.

8. The Parties join in this Stipulation in good faith and not in an effort to unnecessarily prolong the proceedings.

WHEREFORE the Parties jointly request the Board adopt the foregoing revised case management schedule and for all other relief, just and appropriate in the premises.

Date: October 20, 2015

Respectfully submitted,

By: /s/Jon M. Gibbs
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