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

Proceeding	91217290
Party	Defendant Three Notch'd Brewing Company, LLC
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Submission	Stipulated/Consent Motion to Extend
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Date	03/13/2015
Attachments	2015-03-13 Stipulated Motion to Extend Discovery.pdf(158033 bytes)

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

CHRISTOPHER LOHRING,)	
)	
Opposer,)	
)	Opposition No. 91217290
v.)	
)	Serial No. 85/920,112
THREE NOTCH'D BREWING COMPANY, LLC,)	
)	
Applicant.)	
)	

STIPULATED MOTION TO EXTEND DISCOVERY

Opposer Christopher Lohring (“Opposer”) and Applicant Three Notch’d Brewing Company, LLC (“Applicant”) (collectively, the “parties”), by and through their respective counsel, pursuant to Rule 2.120(a) of the Trademark Rules of Practice (37 C.F.R. § 2.120(a)), hereby move for an order extending the close of discovery in this proceeding in order to explore settlement and so that the parties may conduct additional discovery, including depositions. In support thereof, the parties state as follows:

1. Discovery is set to close in this proceeding on April 6, 2015.

2. The parties desire to extend the close of discovery in this proceeding by fourteen (14) days, through and including April 20, 2015, in order to explore settlement and so that the parties may conduct additional discovery, and that all remaining deadlines be similarly extended, as follows:

- Discovery Closes April 20, 2015
- Plaintiff's Pretrial Disclosures June 4, 2015
- 30-day testimony period for plaintiff's testimony to close July 19, 2015
- Defendant/Counterclaim Plaintiff's Pretrial Disclosures August 3, 2015

- 30-day testimony period for defendant and plaintiff in the counterclaim to close September 17, 2015
- Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due October 2, 2015
- 30-day testimony period for defendant in the counterclaim and rebuttal testimony for plaintiff to close November 16, 2015
- Counterclaim Plaintiff's Rebuttal Disclosures Due December 1, 2015
- 15-day rebuttal period for plaintiff in the counterclaim to close December 31, 2015
- Brief for plaintiff due February 29, 2016
- Brief for defendant and plaintiff in the counterclaim due March 30, 2016
- Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due April 29, 2016
- Reply brief, if any, for plaintiff in the counterclaim due May 14, 2016

3. This motion is not brought in bad faith or for the purposes of delay.

WHEREFORE, the parties respectfully request that the Board order that that the date of close of discovery in this proceeding be extended by fourteen (14) days, and that all remaining deadlines be similarly extended, as set forth above.

Date: March 13, 2015

Respectfully submitted,

By: / Daniel N. Smith /
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Counsel for Opposer

Counsel for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March, 2015, the foregoing STIPULATED MOTION TO EXTEND DISCOVERY has been served on Opposer, Christopher Lohring, by mailing a true and correct copy of the same by electronic mail to:

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