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Filing date: **11/25/2015**

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

Proceeding	91220720
Party	Defendant Carrot Creative, LLC
Correspondence Address	KIMBERLY B HERMAN SULLLIVAN & WORCESTER LLP ONE POST OFFICE SQUARE BOSTON, MA 02109 UNITED STATES kherman@sandw.com, trademark@sandw.com, lrobins@sandw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kimberly B. Herman
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Signature	/Kimberly B. Herman/
Date	11/25/2015
Attachments	Stipulation for Extension - 91220720 - 11-25-15(B1950620).PDF(166394 bytes)

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

DENTSU AEGIS NETWORK FRANCE,)	
)	
Opposer,)	Opposition No. 91220720
)	
v.)	Mark: CARROT
)	
CARROT CREATIVE, LLC,)	Application No. 86/232710
)	Filing Date: March 26, 2014
Applicant.)	Publication Date: August 26, 2014

**MOTION FOR AN EXTENSION OF DISCOVERY AND TRIAL PERIODS WITH
CONSENT**

The Discovery Period is currently set to open on November 29, 2015. Carrot Creative, LLC requests that such date be extended for 30 days, or until December 29, 2015, and that all subsequent dates be reset accordingly.

Action	Proposed Deadline
Initial Disclosures Due	January 28, 2016
Expert Disclosures Due	May 27, 2016
Discovery Closes	June 26, 2016
Plaintiff's Pretrial Disclosures	August 10, 2016
Plaintiff's 30-day Trial Period Ends	September 24, 2016
Defendant's Pretrial Disclosures	October 9, 2016
Defendant's 30-day Trial Period Ends	November 23, 2016
Plaintiff's Rebuttal Disclosures	December 8, 2016
Plaintiff's 15-day Rebuttal Period Ends	January 7, 2017

The grounds for this request are as follows:

The parties are engaged in settlement discussions.

Carrot Creative, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Carrot Creative, LLC has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Respectfully Submitted,

CARROT CREATIVE, LLC

By its attorneys,

Dated: November 25, 2015

By: /Lawrence R. Robins/

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Motion for an Extension of Discovery and Trial Periods with Consent has been served upon counsel for the Opposer at its address of record by e-mail on this 25th day of November 2015:

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/Lawrence R. Robins/
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