

ESTTA Tracking number: **ESTTA732103**

Filing date: **03/08/2016**

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

| | |
|------------------------|--|
| Proceeding | 91221978 |
| Party | Plaintiff LT Overseas North America, Inc. |
| Correspondence Address | STEVEN J NATAUPSKY KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@knobbe.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Jessica C. Sganga |
| Filer's e-mail | efiling@knobbe.com |
| Signature | /Jessica C. Sganga/ |
| Date | 03/08/2016 |
| Attachments | Stipulated Motion to Extend Dates LTFOO.060M.pdf(135413 bytes) |

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

| | | |
|----------------------------------|---|--------------------------|
| LT Overseas North America, Inc., |) | Opposition No.: 91221978 |
| |) | |
| Opposer, |) | Mark: ROYAL GREENLAND |
| |) | |
| v. |) | |
| |) | |
| Royal Greenland A/S, |) | |
| |) | |
| Applicant. |) | |

STIPULATED MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

LT Overseas North America, Inc. ("Opposer") hereby requests that the Trademark Trial and Appeal Board (the "Board") further extend all dates in the above-referenced opposition proceeding by thirty (30) days pending the parties' settlement discussions. The parties conducted the settlement/discovery conference on January 26, 2016.

Specifically, the following deadlines would apply:

| | |
|--|-------------------|
| Initial Disclosures Due : | 04/25/2016 |
| Expert Disclosure Due : | 08/23/2016 |
| Discovery Closes : | 09/22/2016 |
| Plaintiff's Pretrial Disclosures : | 11/06/2016 |
| Plaintiff's 30-day Trial Period Ends : | 12/21/2016 |
| Defendant/ Counterclaim Plaintiff's Pretrial Disclosures : | 01/05/2017 |
| 30-day testimony period for defendant and plaintiff in the counterclaim to close : | 02/19/2017 |
| Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due : | 03/05/2017 |
| 30-day testimony period for defendant in the counterclaim and rebuttal testimony for plaintiff to close : | 04/20/2017 |
| Counterclaim Plaintiff's Rebuttal Disclosures Due : | 05/05/2017 |
| 15-day rebuttal period for plaintiff in the counterclaim to Close: | 05/20/2017 |
| Brief for plaintiff due: | 08/03/2017 |
| Brief for defendant and plaintiff in the counterclaim due: | 09/02/2017 |

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|---|------------|
| Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due: | 10/02/2017 |
| Reply brief, if any, for plaintiff in the counterclaim due: | 10/17/2017 |

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

LT Overseas North America, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Respectfully submitted,

• KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: March 8, 2016

By: 
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LT Overseas North America

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **STIPULATED MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING** upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid, on March 8, 2016, addressed as follows:

Bassam N. Ibrahim
Buchanan Ingersoll & Rooney PC
1737 King Street, Suite 500
Alexandria, VA 22314



Sarah Beno Couvillion

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