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Filing date: **02/12/2016**

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

Proceeding	91225716
Party	Defendant Guotai International LLC
Correspondence Address	ERIC J. VON VORYS Shulman Rogers Gandal Pordy & Ecker P A 12505 Park Potomac Ave Fl 6 Potomac, MD 20854-6803 evonvorys@shulmanrogers.com
Submission	Stipulated/Consent Motion to Extend
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Date	02/12/2016
Attachments	Ext Time Answer 2-12-16.pdf(69575 bytes)

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

In the Matter of Application Serial No. 86640678
Published in the *Official Gazette* on September 8, 2015
Trademark: **THE LEGACY OF CHINA**

JACKSON FAMILY FARMS, LLC, :
 :
 Opposer, :
 :
 v. : Opposition No. 91/225716
 :
GUOTAI INTERNATIONAL LLC, :
 :
 Applicant. :

STIPULATED MOTION TO EXTEND TIME TO FILE ANSWER

Guotai International LLC (“Applicant”), by and through its attorneys, and with the consent of Opposer, Jackson Family Farms, LLC (“Opposer”) (together, the “Parties”) hereby respectfully request a thirty (30) day extension of the time to file the Answer to the Opposition, which deadline is currently scheduled for February 15, 2016. This request is timely filed before such deadline. This motion for an extension of time is made solely on the grounds that the Parties need additional time to pursue settlement discussions.

The Parties further requests that all other scheduling dates be advanced thirty (30) days as follows:

Time to Answer	3/15/2016
Deadline for Discovery Conference	4/16/2016
Discovery Opens	4/16/2016
Initial Disclosures Due	5/15/2016
Expert Disclosures Due	9/13/2016
Discovery Closes	10/12/2016
Plaintiff's Pretrial Disclosures	11/27/2016

Plaintiff's 30-day Trial Period Ends	1/11/2016
Defendant's Pretrial Disclosures	1/26/2016
Defendant's 30-day Trial Period Ends	3/9/2017
Plaintiff's Rebuttal Disclosures	3/24/2017
Plaintiff's 15-day Rebuttal Period Ends	4/26/2017

Applicant has secured the express consent of Opposer to this proceeding for the extension and resetting of dates requested herein. Based on the foregoing, the Parties respectfully request that the Stipulated Motion to Extend Time to File Answer be GRANTED.

Dated: February 12, 2016

DICKENSON PEATMAN & FOGARTY

By: /Aaron D. Currie/
Aaron D. Currie

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Dated: February 12, 2016

SHULMAN ROGERS GANDAL
PORDY & ECKER, PA

By: /Eric J. von Vorys/
Eric J. von Vorys

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2016, a copy of the foregoing Stipulated Motion to Extend Time to File Answer was sent via email and first class mail to:

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