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

Proceeding	92057936
Party	Plaintiff Mars, Incorporated
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Jason J. Mazur/
Date	06/01/2015
Attachments	Mars-QiaQia Consent Motion (6-1-2015).pdf(119332 bytes)

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

MARS, INCORPORATED :
Petitioner :
v. : Cancellation No. 92057936
QIAQIA FOOD CO., LTD. :
Registrant :

**PETITIONER’S MOTION FOR EXTENSION OF TIME
WITH CONSENT**

Petitioner Mars, Incorporated hereby moves that the time within which to serve initial disclosures be extended sixty (60) days to and including July 29, 2015 and that all dates be extended sixty (60) days as follows:

Initial Disclosures Due :	07/29/2015
Expert Disclosures Due :	11/26/2015
Discovery Period to Close :	12/26/2015
Plaintiff Pretrial Disclosures :	02/09/2016
Plaintiff's 30-day Trial Period Ends :	03/25/2016
Defendant's Pretrial Disclosures :	04/09/2016
Defendant's 30-day Trial Period ends :	05/25/2016
Plaintiff's Rebuttal Disclosures :	06/08/2016
Plaintiff's 15-day Rebuttal Period Ends :	07/08/2016

This motion is not made for purposes of delay. The parties remain willing to resolve this matter through negotiation and have continued their settlement discussions since the last extension request was granted. The parties have deferred the taking of discovery so that they can continue to finalize settlement without incurring unnecessary expense.

A written settlement agreement has been drafted and circulated, and since the last extension was granted, both parties have continued to provide input and discuss proposed revisions to the agreement. The parties have also been working through complexities arising from the scope of settlement that encompasses other filings of Registrant in the United States and other countries. Since the last extension was granted, Petitioner and Registrant have held the discovery conference in two notices of opposition filed by Petitioner in the U.S. (No. 91221094 filed March 16, 2015 and No. 91221164 filed March 18, 2015) to applications filed by Registrant for marks within the scope of the proposed agreement. Petitioner and Registrant also have continued to discuss revisions pertaining to the scope of limitations relating to Registrant's marks. Those discussions remain ongoing. The parties' counsel discussed the outstanding issues with their clients, and also in communications with one another on March 31, April 14, April 29, and at the discovery conference on May 26. Currently, Petitioner is awaiting Registrant's response on its latest proposal to address the outstanding issues.

The parties remain hopeful that, with additional time and effort, an amicable settlement remains possible. Accordingly, additional time is needed to enable the parties to finalize settlement. The interests of judicial economy will be best served by allowing the parties to continue their settlement efforts. Counsel is currently unable to provide a definitive timetable for resolution, but will prioritize this matter with the hope of resolving this matter during the current extension period.

Registrant's counsel has consented to the granting of this extension. Accordingly, Petitioner respectfully requests that the Board grant this motion. The parties have already held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

MARS, INCORPORATED

By: /Jason J. Mazur/

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing is being served on Registrant's counsel Lin-Yun Cheng of Pro-Techtor International Services by email at linyun49@gmail.com on June 1, 2015.

 /Jason J. Mazur/