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

Proceeding	91208866
Party	Plaintiff Imagewear Apparel Corp.
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Paul J. Kennedy
Filer's e-mail	kennedyp@pepperlaw.com, catalant@pepperlaw.com
Signature	/Paul J. Kennedy/
Date	03/14/2014
Attachments	03-14-2014 Motion for Extension of Discovery and Trial Periods (Imagewear v. Lee, Opp. No. 91208866).pdf(46310 bytes)

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

IMAGEWEAR APPAREL CORP.

Opposer

v.

ALEX S. LEE

Applicant

: Opposition No. 91208866
: Mark: NGH NEW GENERATION
: HEADGEAR & Design
: Application Serial No.: 85/565794
: Published in *Official Gazette*: September 11, 2012
: Filed: March 9, 2012

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

The close of discovery is currently set to close on March 16, 2014. Opposer Imagewear Apparel Corp., with the consent of Applicant Alex S. Lee, hereby respectfully requests that such date be extended for thirty (30) days, or until April 15, 2014, and that all subsequent dates be reset as follows:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	CLOSED
Discovery Closes :	04/15/2014
Plaintiff's Pretrial Disclosures :	05/30/2014
Plaintiff's 30-day Trial Period Ends :	07/14/2014
Defendant's Pretrial Disclosures :	07/29/2014
Defendant's 30-day Trial Period Ends :	09/12/2014
Plaintiff's Rebuttal Disclosures :	09/27/2014
Plaintiff's 15-day Rebuttal Period Ends :	10/27/2014

The parties are actively engaged in settlement negotiations and a proposed written agreement has been circulated for consideration by the parties.

In view of the foregoing, the parties respectfully request that the Board grant this request to extend for thirty (30) days so that the parties may continue negotiations. Applicant has agreed to service of the Consent Motion via electronic and U.S. First Class Mail.

Respectfully submitted,

/Paul J. Kennedy/

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CERTIFICATE OF SERVICE

I, Paul J. Kennedy, hereby certify that on March 14, 2014, a true and correct copy of the foregoing Motion for an Extension of Discovery and Trial Periods with Consent was served via electronic mail and U.S. First Class Mail, postage prepaid, as follows:

Mr. Alex S. Lee
100 W. 17th Street, #18
Los Angeles, CA 90015-3549
Email: samscahyoon@gmail.com

Applicant

/Paul J. Kennedy/

Paul J. Kennedy