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

Proceeding	91209386
Party	Defendant Realty ONE Group, Inc.
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Submission	Motion to Extend
Filer's Name	Jonathan A. Hyman
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Signature	/jhh/
Date	06/19/2015
Attachments	RELTY.009M-signJointMotionExtend.pdf(311667 bytes)

RELTY.009M/014N TTAB

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEC II LLC and THE ONE GROUP LLC, Petitioners/Opposers, v. REALTY ONE GROUP, INC., Registrant/Applicant.	Proceeding No.: 92057487 Registration No.: 3,351,334 Mark: REALTY ONE GROUP Proceeding No.: 91209386 (consolidated with 92056849) Serial No.: 85/653,197 Mark: ONE Registration No.: 4,261,532 Mark: REALTY ONE GROUP

I hereby certify that this correspondence and all marked attachments are being electronically filed with the Trademark Trial and Appeal Board through their web site located at http://estta.uspto.gov on:

June 19, 2015
(Date)

Jonathan A. Hyman

JOINT MOTION TO EXTEND FOR SETTLEMENT

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

Dear Sir:

Pursuant to C.F.R. § 2.117(c), and T.B.M.P. §§ 510.03(a), 605.02, JEC II LLC and THE ONE GROUP LLC and REALTY ONE GROUP, INC., by and through their attorneys, hereby request that the Trademark Trial and Appeal Board (the "Board") grant the parties a further extension in the above-referenced Consolidated Proceedings for sixty (60) days, including all applicable dates, pending the parties' settlement discussions.

The parties report to the Board that they are actively working towards settlement and have continued work towards settlement, including discussing and circulating draft settlement agreements and negotiating the terms thereof. The parties believe that progress is being made towards resolving most issues regarding settlement, and both parties expect resolution to be forthcoming. The parties

recognize the Board's request for details regarding the efforts made towards settlement of the issues involved in this proceeding including monthly breakdowns of such activities. However, the parties request the Board accept their representation herein that settlement of this proceeding under the terms currently being negotiated between the parties is arguably more complicated by the fact that Petitioners/Opposers are involved in several other proceedings involving the same asserted marks as explained in the previous extension request.

The Board is directed to the parties' last extension request of March 20, 2015 date for the long history of the action through the date of the same. Since this last request, and during these last 75 days, the parties have resolved all but one remaining issue, or one paragraph of an agreement between them settling their dispute. This includes substantial progress regarding the complex SH Group, third party situation described in the parties' last extension request. Nevertheless, and despite these efforts, the parties are still working on the above mentioned last provision, and believe such should be completed between them and the agreement executed within this next sixty (60) day extension period.

The parties respectfully represent herein to the Board their firm belief that they will reach agreement and that these Consolidated Proceedings will be resolved without burdening the Board on substantive matters. However, without the additional extension being requested by this Joint Motion, the parties will need to turn their attention from the progress they are making on their draft agreement, to instead focus on conducting discovery. The parties hope the Board will agree that such would be counterproductive to advancing the parties' settlement negotiations.

In light of all of the above, as well as the significant fact that the parties are jointly making this request, the parties respectfully believe good cause has been shown for the extension of the Consolidated Proceedings, and request that the following new schedule of dates be So Ordered by the Board:

Expert Disclosures Due :	07/23/2015
Discovery Period to Close :	08/22/2015
Plaintiff Pretrial Disclosures :	10/06/2015
Plaintiff's 30-day Trial Period Ends :	11/20/2015
Defendant's Pretrial Disclosures :	12/05/2015
Defendant's 30-day Trial Period ends :	01/19/2016
Plaintiff's Rebuttal Disclosures :	02/03/2016

Plaintiff's 15-day Rebuttal Period Ends :	03/04/2016

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

By: _____
Susan M. Natland
Jonathan A. Hyman
2040 Main St., 14th Floor
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Attorneys for Registrant/Applicant,
REALTY ONE GROUP, INC.
Dated: June 19, 2015

PERGAMENT GILMAN & CEPEDA LLP

By: /Michael R. Gilman/
Michael Gilman
163 Madison Ave., Suite 110
Morristown, NJ 07960
Attorney for Petitioners/Opposes, JEC II LLC and THE ONE GROUP LLC
Dated: June 19, 2015

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **JOINT MOTION TO EXTEND FOR SETTLEMENT** upon Petitioners/Opposes' counsel by sending one copy thereof via email per the parties' agreement on June 19, 2015, addressed as follows:

Michael Gilman, Esq.
PERGAMENT GILMAN & CEPEDA LLP
mgilman@pgclawgroup.com

_____
Jonathan A. Hyman

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