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

Proceeding	91209978
Party	Plaintiff Tissot SA
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Joshua Paul
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Signature	/Joshua Paul/
Date	04/19/2017
Attachments	N1914_Consented Motion - 60 Day EOT_170420.pdf(169297 bytes)

ATTORNEY DOCKET NO.: N1914

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

Tissot SA Opposer, v. American Exchange LLC Applicant.	Opposition No.: 91209978 Serial No.: 85/637,640

CONSENTED MOTION FOR 60 DAY EXTENSION OF TIME OF ALL DATES

Opposer, Tissot SA, and Applicant, American Exchange LLC, by their attorneys, hereby move the Trademark Trial and Appeal Board for an order to extend all current dates in the subject proceeding in order to allow the parties to finalize discovery and continue to evaluate potential settlement of the matter. Both parties consent to this request.

Pursuant to the Board's Order dated January 5, 2017 granting Opposer's motion to extend discovery and trial dates, the parties request this further extension jointly and in good faith. As required by the Board in a previous order, the parties provide the following report of progress regarding discovery and settlement.

The parties maintain that they continue to explore a potential settlement of the overall opposition, and have engaged in productive discussions regarding such options. The parties have also communicated regarding discovery, and are cooperatively resolving all outstanding issues to finalize the process.

Accordingly, the parties respectfully and jointly request a sixty (60) day extension of time to allow the parties to finalize discovery and to further explore settlement without the need for

further proceedings or Board involvement. A further extension is warranted, and will conserve the Board's time and avoid unnecessary expense to the parties.

Therefore, the parties respectfully request that all deadlines be extended sixty days, and that all subsequent dates be reset pursuant to the schedule below:

Applicant to comply with Board's May 16, 2016 Order compelling discovery:	May 5, 2017
Discovery Period to Close:	May 5, 2017
Plaintiff Pretrial Disclosures:	June 19, 2017
Plaintiff's 30-day Trial Period Ends:	August 3, 2017
Defendant's Pretrial Disclosures:	August 18, 2017
Defendant's 30-day Trial Period Ends:	October 2, 2017
Plaintiff's Rebuttal Disclosures:	October 17, 2017
Plaintiff's 15-day Rebuttal Period Ends:	November 16, 2017

This motion is not being filed for purpose of delay. The parties believe that, based on their cooperative efforts in advancing this proceeding, they have established good cause and respectfully request the Board grant this motion to extend.

Respectfully submitted,

/Joshua Paul/
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Attorneys for Opposer

April 19, 2017

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Attorneys for Applicant

April 19, 2017

CERTIFICATE OF SERVICE

I, Lisa A. McAndrews, hereby certify that I caused a true and correct copy of the above **Consented Motion for a 60 Day Extension of All Dates** to be served on counsel for Applicant on April 19, 2017, to be served via e-mail (by prior agreement of the parties) on Applicant's Counsel at the address shown below:

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/Lisa A. McAndrews/