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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	Motion to Extend
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Date	05/05/2017
Attachments	N1914_Consented Motion for EOT_170504.pdf(170037 bytes)

ATTORNEY DOCKET NO.: N1914

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

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

CONSENTED MOTION FOR 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 April 25, 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.

On May 3, 2017, the parties engaged in a productive meet and confer session in order to discuss the resolution of outstanding discovery items as well as the status of a potential settlement of the overall opposition. The parties have agreed on the schedule set forth below in

order to cooperatively resolve the discovery necessary while the parties continue to also consider any possible settlement terms.

Accordingly, the parties respectfully and jointly request an 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, and that all subsequent dates be reset pursuant to the schedule below:

Applicant to comply with Board's May 16, 2016 Order compelling discovery (the "Discovery Order"):	July 25, 2017
Discovery Period to Close:	August 25, 2017
Plaintiff Pretrial Disclosures:	October 9, 2017
Plaintiff's 30-day Trial Period Ends:	November 23, 2017
Defendant's Pretrial Disclosures:	December 8, 2017
Defendant's 30-day Trial Period Ends:	January 22, 2018
Plaintiff's Rebuttal Disclosures:	February 6, 2018
Plaintiff's 15-day Rebuttal Period Ends:	March 8, 2018

The parties' agreement to extension of Applicant's deadline to comply with the Discovery Order to July 25, 2017 is not an acknowledgement by either of the parties that Applicant has not complied with the Discovery Order.

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

May 5, 2017

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Attorneys for Applicant

May 5, 2017

CERTIFICATE OF SERVICE

I, Lisa A. McAndrews, hereby certify that I caused a true and correct copy of the above **Consented Motion for Extension of All Dates** to be served on counsel for Applicant on May 5, 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/