ESTTA Tracking number: **ESTTA690236**

Filing date: **08/18/2015**

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

Proceeding.	91213620
Applicant	Defendant Benecke-Kaliko AG
Other Party	Plaintiff British Knights N.A. LLC
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 08/23/2015. Benecke-Kaliko AG requests that such date be extended for 60 days, or until 10/22/2015, and that all subsequent dates be reset accordingly.

Time to Answer :	10/22/2015
Deadline for Discovery Conference :	11/21/2015
Discovery Opens :	11/21/2015
Initial Disclosures Due :	12/21/2015
Expert Disclosure Due :	04/19/2016
Discovery Closes :	05/19/2016
Plaintiff's Pretrial Disclosures :	07/03/2016
Plaintiff's 30-day Trial Period Ends :	08/17/2016
Defendant's Pretrial Disclosures :	09/01/2016
Defendant's 30-day Trial Period Ends :	10/16/2016
Plaintiff's Rebuttal Disclosures :	10/31/2016
Plaintiff's 15-day Rebuttal Period Ends :	11/30/2016

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *This request is made in good faith and is not for the purpose of mere delay. The parties have negotiated core terms regarding the subject application for settlement of this matter. A draft settlement agreement has been exchanged. As recently as June 26, 2015, the parties, through counsel, discussed terms for settlement and continue to negotiate a final resolution.*

Benecke-Kaliko AG has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Benecke-Kaliko AG has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,
/jwm/
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