ESTTA Tracking number: **ESTTA816028**

Filing date: **04/21/2017**

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

Proceeding	91214674
Party	Plaintiff Chicago Blackhawk Hockey Team, Inc.
Correspondence Address	JAMES J PASTORE JR DEBEVOISE & PLIMPTON LLP 919 THIRD AVENUE NEW YORK, NY 10022 UNITED STATES jjpastore@debevoise.com, trademarks@debevoise.com, tprochnow@nhl.com, JWang@nhl.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	James J. Pastore, Jr.
Filer's e-mail	jjpastore@debevoise.com, trademarks@debevoise.com, tprochnow@nhl.com, JWang@nhl.com, jnjberge@aol.com, jbberge@hotmail.com
Signature	/James J. Pastore, Jr./
Date	04/21/2017
Attachments	1003004555v1_42117 consented to motion for extension_2.pdf(12352 bytes)

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

CHICAGO BLACKHAWK HOCKEY TEAM, INC.,	:	
Opposer	:	Opposition No. 91,214,674
v.	:	
JASON J.O. BERGE,	:	
Applicant.	:	

CONSENTED MOTION FOR AN EXTENSION
OF DISCOVERY AND TRIAL PERIODS

Pursuant to TBMP § 509.01(a), Opposer Chicago Blackhawk Hockey Team, Inc. ("Opposer") hereby requests a 60-day extension of time for all current discovery and trial deadlines in the above proceeding. The next deadline is for Expert Disclosure on April 23, 2017. Applicant Jason J.O. Berge expressly consented to this 60-day extension request via email on April 20, 2017.

Good cause to grant this consented extension request exists because the parties have been discussing an amicable resolution of the opposition. The negotiations are complicated by the opposition filed against the same application by Football Northwest LLC and NFL Properties LLC (Opposition No. 91,214,675) (the "Parallel Opposition"). Opposer understands the parties in the Parallel Opposition have reached a settlement agreement that requires the consent of Opposer herein. Opposer provided Applicant with a proposed settlement agreement on March 10, 2017. The requested extension will allow the parties and the opposers in the Parallel Opposition to continue their efforts to resolve this matter amicably.

Opposer therefore respectfully requests that the Board grant the requested 60-day extension and reset the deadlines as set forth below.

Expert Disclosures Due :	06/22/2017
Discovery Period to Close :	07/22/2017
Plaintiff Pretrial Disclosures :	09/05/2017
Plaintiff's 30-day Trial Period Ends :	10/20/2017
Defendant's Pretrial Disclosures :	11/04/2017
Defendant's 30-day Trial Period ends :	12/19/2017
Plaintiff's Rebuttal Disclosures :	01/03/2018
Plaintiff's 15-day Rebuttal Period Ends :	02/02/2018

Dated: April 21, 2017
New York, New York

DEBEVOISE & PLIMPTON LLP

By: /s/ James J. Pastore, Jr.
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Attorneys for Applicant
Chicago Blackhawk Hockey Team, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of this CONSENTED MOTION FOR AN EXTENSION OF DISCOVERY AND TRIAL PERIODS has been served by email

Jason J.O. Berge
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Bothell, Washington 98028
jnjberge@aol.com; jbberge@hotmail.com

Executed this 21st day of April 2017 in New York, New York.

/s/ James J. Pastore Jr.
James J. Pastore, Jr.