ESTTA Tracking number: **ESTTA840458**

Filing date: **08/18/2017**

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 Email: jjpastore@debevoise.com, trademarks@debevoise.com, tproch-now@nhl.com, JWang@nhl.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	James J. Pastore, Jr.
Filer's email	jjpastore@debevoise.com, trademarks@debevoise.com, tprochnow@nhl.com, JWang@nhl.com, jnjberge@aol.com, jbberge@hotmail.com
Signature	/James J. Pastore, Jr./
Date	08/18/2017
Attachments	- 1003330627v1-8_18_18 consented to motion for extension.pdf(13684 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 30-day extension of time for all current discovery and trial deadlines in the above proceeding. The next deadline is for Expert Disclosure on August 21, 2017. Applicant Jason J.O. Berge expressly consented to this 30-day extension request via email on August 17, 2017.

Good cause to grant this consented extension request exists because the parties have been negotiating an amicable resolution of the opposition. Opposer has executed a final settlement agreement that it has sent to Applicant for counter-signature. Applicant has indicated that the agreement is acceptable. Because Applicant's application was also opposed by Football Northwest LLC and NFL Properties LLC (Opposition No. 91,214,675) (the "Parallel Opposition"), certain provisions of the settlement agreement require consent by the Opposers in the Parallel Opposition. Opposer understands from the Applicant that he expects to finalize a settlement in the Parallel Opposition shortly,

and once finalized, the Opposers in the Parallel Opposition will grant consent in the current opposition.

Opposer therefore respectfully requests that the Board grant the requested 30-day extension and reset the deadlines as set forth below.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosures Due :	09/20/2017
Discovery Period to Close :	10/20/2017
Plaintiff Pretrial Disclosures :	12/04/2017
Plaintiff's 30-day Trial Period Ends :	01/18/2018
Defendant's Pretrial Disclosures :	02/02/2018
Defendant's 30-day Trial Period ends :	03/19/2018
Plaintiff's Rebuttal Disclosures :	04/03/2018
Plaintiff's 15-day Rebuttal Period Ends :	05/03/2018

Dated: August 19, 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
9101 NE 160th Pl
Bothell, Washington 98028
jnjberge@aol.com; jbberge@hotmail.com

Executed this 19th day of August 2017 in New York, New York.

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