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

Proceeding	91216605
Party	Plaintiff Derek A. Lopez
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Submission	Motion to Extend
Filer's Name	Jon M. Gibbs, Reg. No. 47,594
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Signature	/Jon M. Gibbs/
Date	05/20/2016
Attachments	05-20-16 Motion for Extension of Time.pdf(11550 bytes)

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

DEREK A. LOPEZ,)	
)	
Opposer,)	Oppn. Nos.: 91216538
)	91216605
)	91216672
v.)	
)	Application Serial No.: 85/310,186
TED WONG JKD, LLC,)	Mark: TED WONG JEET KUNE DO
)	and Design
)	
Applicant.)	Publication Date: January 21, 2014
)	

OPPOSER’S MOTION FOR EXTENSION OF TIME

Opposer Derek Lopez, by and through his undersigned counsel, hereby requests that the grant an extension of time extending the Case Management Schedule by thirty (30) days and in support thereof would state:

1. The parties are simultaneously engaged in three (3) oppositions, namely, Opposition Proceeding Numbers: 91216538; 91216605; and 91216672 (collectively the “Proceedings”).
2. The parties have engaged in good faith negotiations regarding settlement.
3. The parties however have not had the opportunity to finalize the terms of the discussed settlement, nor have they had the opportunity to discuss the request made herein, despite correspondence up to and including Wednesday, May 18, 2016.
4. The undersigned has repeatedly attempted to contact Counsel for the Applicant, Mr. Minch via office phone, mobile phone and e-mail without success

compelling the conclusion that Mr. Minch is currently unavailable. Accordingly, Opposer is unaware of whether Applicant objects or stipulates to the requested extension.

5. Tomorrow is the deadline for Opposer's Trial Brief and Opposer files this Motion in an abundance of caution to preserve Opposer's rights in the event a stipulation is not reached.

6. Opposer respectfully requests that the Case Management deadlines be extended by thirty (30) days to complete the terms of a settlement or finalize Opposer's Trial Brief.

7. Opposer makes this request in good faith and not in an effort to unnecessarily prolong the proceedings.

WHEREFORE Opposer requests the Board extend the Case Management schedule by thirty (30) days of time for the aforementioned reasons.

Date: May 20, 2016

Respectfully submitted,

By: /s/Jon M. Gibbs

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Derek A. Lopez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 20, 2016, I served a true and correct copy of the foregoing via e-mail to:

Theodore J. Minch
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By: /s/Jon M. Gibbs
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