

ESTTA Tracking number: **ESTTA828682**

Filing date: **06/22/2017**

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

Proceeding	91216605
Party	Plaintiff Derek A. Lopez
Correspondence Address	JON M GIBBS LOWNDES DROSDICK DOSTER KANTOR & REED PA 215 N EOLA DR ORLANDO, FL 32801 UNITED STATES Email: trademarks@lowndes-law.com, jon.gibbs@lowndes-law.com
Submission	Motion to Reopen
Filer's Name	Jon M. Gibbs, Reg. No. 47,594
Filer's email	trademarks@lowndes-law.com, jon.gibbs@lowndes-law.com
Signature	/Jon M. Gibbs/
Date	06/22/2017
Attachments	6-22-17 Motion to Re-open and Extend Trial_Dates.pdf(28390 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: <b>TED WONG JEET KUNE DO</b>
	)	and Design
	)	
Applicant.	)	Publication Date: January 21, 2014
	)	

**JOINT MOTION TO RE-OPEN TRIAL DATES**

Opposer Derek Lopez and Applicant Ted Wong JKD, LLC, by and through their undersigned counsel, hereby request that the Board re-open and extend the Discovery Period 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 settlement negotiations, but have not been able to come to a final resolution in the Proceedings.
3. The parties have stipulated to the re-opening of the trial dates, beginning with Plaintiff’s Pretrial Disclosures to be served on Defendant no later than Friday, June 30, 2017.

4. The parties propose the following schedule<sup>1</sup>:
  - a. Plaintiff's Pretrial Disclosures 6/30/2017
  - b. Plaintiff's 30 Day Trial Period Ends 8/11/2017
  - c. Defendant's Pretrial Disclosures 8/25/2017
  - d. Defendant's 30-day Trial Period Ends 9/15/2017
  - e. Plaintiff's Rebuttal Disclosures 10/20/2017
  - f. Plaintiff's 15-day Rebuttal Period Ends 11/13/2017

5. The parties make this request in good faith and not in an effort to unnecessarily prolong the Proceedings.

WHEREFORE the parties jointly request the Board re-open the Proceedings and extend the trial dates as requested herein, or as may be amended by the Board in its discretion.

Date: June 22, 2017

Respectfully submitted,

By: /s/Jon M. Gibbs

Jon M. Gibbs  
Florida Bar No.: 494534  
LOWNDES, DROSDICK, DOSTER,  
KANTOR & REED, P.A.  
215 North Eola Drive  
Orlando, FL 32801  
Ph: 407-843-4600  
Fax: 407-843-4444  
jon.gibbs@lowndes-law.com  
*Attorney for Opposer*  
*Derek A. Lopez*

By: /s/ Theodore J. Minch

Theodore J. Minch  
Attorney No. 18798-49  
SOVICH MINCH, LLP  
10500 Crosspoint Boulevard  
Indianapolis, Indiana 46256  
Telephone: (317) 335-3601  
Facsimile: (317) 335-3602  
Email: tjminch@sovichminch.com  
*Attorneys for Respondent Ted Wong JKD,*  
*LLC*

---

<sup>1</sup> The proposed dates are requested by the parties, however, the Board may revise or amend the proposed dates in its discretion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 22, 2017, I served a true and correct copy of the foregoing via e-mail to:

Theodore J. Minch  
Sovich Minch, LLP  
10500 Crosspoint Blvd  
Indianapolis, IN 46256  
[tjminch@sovichminch.com](mailto:tjminch@sovichminch.com)

By: /s/Jon M. Gibbs  
Jon M. Gibbs  
Florida Bar No.: 494534  
LOWNDES, DROSDICK, DOSTER,  
KANTOR & REED, P.A.  
215 North Eola Drive  
Orlando, FL 32801  
Ph: 407-843-4600  
Fax: 407-843-4444  
[jon.gibbs@lowndes-law.com](mailto:jon.gibbs@lowndes-law.com)  
*Attorney for Opposer*  
*Derek A. Lopez*