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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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Date	03/09/2018
Attachments	3-9-18 Joint Motion to Revise Case Management Plan.pdf(28118 bytes)

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

DEREK A. LOPEZ, an Individual,)	
)	
Opposer,)	Opposition Nos.: 91216672, 91216605,
)	91216538
vs.)	
)	Serial Nos.: 85/310,210, 85/310,234,
TED WONG JKD, LLC,)	85/310,186
)	
Applicant.)	

PARTIES' JOINT MOTION TO REVISE THE CASE MANAGEMENT PLAN

Comes now Applicant TED WONG JKD, LLC, by counsel, Theodore J. Minch, and Opposer DEREK A. LOPEZ, by counsel Jon M. Gibbs (Applicant and Opposer are hereinafter referred to as the "Parties"), together, and hereby jointly move the Board to adopt the proposed revised case management deadlines. In support of the motion, the Parties do hereby state and aver as follows:

1. The Parties are simultaneously engaged in three (3) oppositions, namely, Opposition Proceeding Numbers: 91216538; 91216605; and 91216672 (collectively the "Proceedings").
2. By way of pre-trial orders dated March 11, 2015, the deadlines for all three (3) oppositions were made uniform.

3. On August 3, 2017, the Board agreed to extend the following case management deadlines.

Plaintiff's 30-day Trial Period Ends 10/1/17
Defendant's Pretrial Disclosures 10/8/17
Defendant's 30-day Trial Period Ends 12/6/17
Plaintiff's Rebuttal Disclosures 12/15/17
Plaintiff's 15-day Rebuttal Period Ends 1/14/2018

4. As a result the continued open communications between the Parties with regard to these matters and, even, the potential resolution of the same, and, additionally, in light of counsel for the Parties' respective litigation calendars, the Parties have agreed to extend all pending/open deadlines in these matters as follows:

Plaintiff's 30-day Trial Period Ends 4/30/18;
Defendant's Pretrial Disclosures 5/6/2018;
Defendant's 30-day Trial Period Ends 7/6/2018;
Plaintiff's Rebuttal Disclosures 7/13/2018; and
Defendant's 15-day Rebuttal Period Ends 8/12/2017.
Briefs to be filed in accordance with Trademark Rules 2.128(a) and (b).

5. Based upon the foregoing, the Parties desire the case management plan be amended in accordance with the foregoing schedule.

6. The Parties have exchanged disclosures and neither party anticipates the retention of experts in these matters.

7. The Parties join in this Stipulation in good faith and not in an effort to unnecessarily prolong the proceedings.

WHEREFORE the Parties jointly request the Board adopt the foregoing revised case management schedule and for all other relief, just and appropriate in the premises.

Date: March 9, 2018

Respectfully submitted,

By: /s/ Jon M. Gibbs
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