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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
Correspondence Address	JON M GIBBS LOWNDES DROSDICK DOSTER KANTOR & REED PA 215 N EOLA DR ORLANDO, FL 32801 UNITED STATES trademarks@lowndes-law.com, jon.gibbs@lowndes-law.com
Submission	Stipulated/Consent Motion to Reopen
Filer's Name	Jon M. Gibbs, Reg. No. 47,594
Filer's e-mail	jon.gibbs@lowndes-law.com, trademarks@lowndes-law.com
Signature	/Jon M. Gibbs/
Date	02/11/2015
Attachments	Joint Motion to Reopen and Extend Discovery.pdf(11350 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
)	

JOINT MOTION TO RE-OPEN AND EXTEND DISCOVERY

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 Proceedings have different deadlines.
3. The parties have agreed to treat the Proceedings as if they contain the same deadlines, using the deadlines of Proceeding Number 91216672.
4. The parties stipulated to a sixty (60) day extension of the deadlines in Proceeding Number 91216672.
5. The parties did not file a timely stipulation for extension of time and the Discovery closed on February 8, 2014.

6. The parties are currently engaged in the discovery process but it is not yet complete. Accordingly, the parties would like to re-open and extend the discovery period.

7. 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 Discovery period and grant the parties a sixty (60) day extension of time in which to complete Discovery.

Date: February 11, 2015

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 Opposer Ted Wong JKD,
LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 11, 2014, 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

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