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

Proceeding	91220077
Party	Plaintiff The Chamberlain Group, Inc.
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Submission	Motion to Extend
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Date	01/25/2019
Attachments	MYLINK Ext.pdf(138131 bytes )

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

The Chamberlain Group, Inc.  
Opposer,

v.

Somfy SAS,  
Applicant.

Opposition No. 91220077

Application No. 86266056  
For MYLINK

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

**Consented Motion to Extend  
Proceeding Deadlines for Ninety Days for Settlement**

Opposer The Chamberlain Group, Inc. and Applicant Somfy SAS are working to settle this opposition. With the consent of Somfy SAS and on behalf of the parties, Opposer respectfully requests that the proceeding deadlines in this case be extended by ninety days (as set out below) to afford the parties the opportunity to continue settlement efforts and negotiations.

As set forth in the August 30, 2018 Order, the Parties report on the progress of their settlement efforts. The Parties continue to engage in settlement negotiations and believe a final draft is now imminent. In a November 30, 2018 email exchange, Applicant's counsel exchanged a settlement agreement with some adjustments that are now in front of Opposer for consideration. In an email exchange of January 22, 2019, counsel for the parties confirmed and provided their approval and consent to the filing of this motion and the extension of the deadlines sought by the parties.

Because the Parties are working on finalizing and executing a written settlement agreement, good cause exists for the Board to grant the requested extension of the proceeding

deadlines. The Parties therefore respectfully request that the Board extend by sixty days and reset the proceeding deadlines as follows:

Answer due:	Closed
Deadline for Discovery Conference:	Closed
Discovery opens:	Closed
Initial Disclosures due:	Closed
Expert Disclosures due:	04/27/2019
Discovery closes:	05/27/2019
Plaintiff's Pretrial Disclosures:	07/11/2019
Plaintiff's 30-day Trial Period Ends:	08/25/2019
Defendant's Pretrial Disclosures:	09/09/2019
Defendant's 30-day Trial Period Ends:	10/24/2019
Plaintiff's Rebuttal Disclosures:	11/08/2019
Plaintiff's 15-day Rebuttal Period Ends:	12/08/2019
Plaintiff's Opening Brief Due:	02/06/2020
Defendant's Brief Due:	03/07/2020
Plaintiff's Reply Brief Due:	03/22/2020
Request for Oral Hearing (optional):	04/01/2020.

As shown above, this consented extension request is not filed for the purposes of delay.

The Parties are working on a written settlement agreement and submit that extending the deadlines in the proceeding will save resources for the Board and for the Parties. With this motion, counsel for Opposer provides email addresses of record for the Parties so that any order on this motion may be issued electronically.

Dated: January 25, 2019

Respectfully submitted,

The Chamberlain Group, Inc.

/Edward E. Clair/

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing, Consented Motion to Extend Proceeding Deadlines for Ninety Days for Settlement, has been served upon Applicant via email using the email address of record:

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On this 25th day of January, 2019.

/Edward E. Clair/  
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